

# Controlled Foreign Corporations, 1980: A Geographical Perspective

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Controlled Foreign Corporations (CFC's) have played an important role in the world economy. While remitting \$10.7 billion in dividends during 1980 to their U.S. parent corporations, these 35,471 foreign corporations generated nearly \$700 billion of business receipts throughout the world. They also produced \$47.6 billion of pre-tax earnings and profits, with \$16.4 billion being paid in income taxes to foreign governments.

## THE CONCEPT OF A CONTROLLED FOREIGN CORPORATION

A CFC is generally described as a corporation created under the laws of a government outside of the United States and with more than 50 percent of the voting stock or more than 50 percent of all classes of stock owned by U.S. persons on any day during the taxable year of the CFC. U.S. persons include corporations, partnerships, estates, trusts, and citizens and residents of the United States. The filing requirements for the Form 2952, Information Return with Respect to a Controlled Foreign Corporation, were such that a U.S. shareholder had to file a Form 2952 for each accounting period for each CFC which was controlled by that person, i.e., with over 50 percent stock ownership, for an uninterrupted period of 30 days during the CFC's annual accounting period. In addition to the CFC's described above, other "lower-tiered" foreign corporations, through a chain of control, were considered to be controlled by a U.S. person. If the foreign corporation (first-tier) controlled by a U.S. person(s) in turn owned more than 50 percent of a second-tier foreign corporation which, in turn, owned more than 50 percent of a third-tier foreign corporation, and so forth, then each foreign corporation was considered to be "controlled." As such, a Form 2952 had to be filed for each of these corporations by the U.S. parent. The data contained in this article are based on Forms 2952 filed by U.S. parent corporations [1].

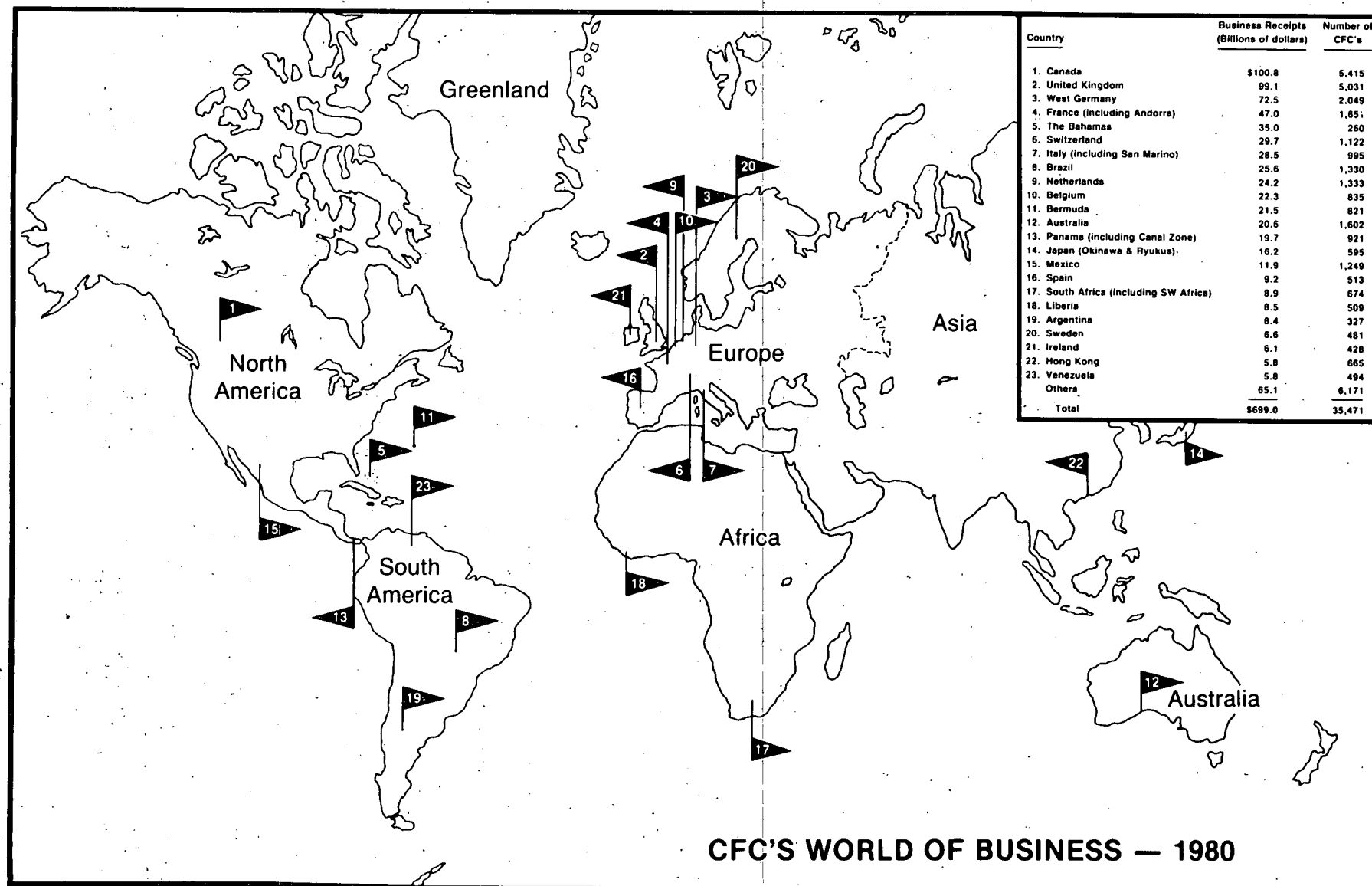
## INVESTMENT DECISIONS ABOUT CFC'S

The use of Controlled Foreign Corporations was considered by U.S. corporations in many

investment decisions dealing with international markets. These decisions were generally concerned with underlying economic factors (such as proximity to the supply of raw materials and markets for finished products) and involved the location of the investments, i.e., either in the United States or in a foreign country. If a foreign location was decided on, then in most cases a permanent establishment in the foreign country was used. This was either in the form of a branch operation of the U.S. company or an investment in a foreign corporation. (Certain types of foreign operations, such as sales, did not require a foreign establishment, but rather could be conducted through pure exporting operations in the United States, independent agents in the foreign country, or mailing operations.) CFC's were one alternative often used when the foreign corporation approach was selected by U.S. companies. (If control of the foreign operation was not needed, then a U.S. company could invest in a foreign corporation with 50 percent or less stock ownership.) For 1980, CFC's had total assets of \$508 billion, an indicator of the use of CFC's as an investment vehicle. They, in turn, generated \$699 billion of business receipts throughout the world. The world map, following, shows the location pattern of CFC's.

U.S. tax considerations were an important incentive for establishing CFC's. The earnings and profits generated by CFC's in foreign countries were generally tax deferred until repatriated in the form of dividends to U.S. corporations. However, certain transactions made by CFC's in generating earnings and profits were considered to be "Subpart F income," which in turn, was taxable by the United States regardless of whether repatriated or not. This income was considered deemed to have been distributed to the U.S. shareholders of CFC's, and thereby taxable to the shareholders. Subpart F income included income from the insurance and reinsurance of U.S. risks, "foreign base company income," boycott participation income, and payments consisting of illegal bribes and kick-backs. For 1980, Subpart F income amounted to \$3.1 billion and pre-tax earnings and profits generated by CFC's were \$47.6 billion. CFC's

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paid \$16.4 billion of income taxes to foreign governments during this same period. There were also \$10.7 billion of dividends distributed by CFC's to U.S. parent corporations, which were also taxable. (These dividends were not, however, all distributed from current earnings and profits, but came in part from accumulated earnings and profits of prior years.)

#### TAX LAWS OF FOREIGN COUNTRIES

As previously stated, economic factors were of major importance in investment decisions. For instance, the availability of skilled labor and markets for products help explain the predominance of manufacturing CFC's in European countries such as France, the United Kingdom, and West Germany (see Figure A). Nearly 74 percent of the assets of all European CFC's belonged to manufacturing corporations. However, in addition to the economic feasibility of investments, tax laws of certain foreign countries provided incentives to U.S. companies to invest in foreign corporations, including CFC's.

CFC's not only provided U.S. tax incentives for their parent companies, but many CFC's also enjoyed low tax rates (and other beneficial tax provisions) in certain foreign countries in which they operated. Foreign tax rates played an important role for U.S. companies in making offshore investment decisions. The host country has the first opportunity to tax the income the CFC earned in its country. When this income is repatriated to the U.S. parent company, a withholding tax may also be levied by the foreign country. When the dividends are received by the parent company from the CFC's, the dividends are subject to U.S. taxation. The United States also taxes deemed distributions, i.e., Subpart F income, as previously discussed. In order to avoid double taxation the U.S. firm can use a foreign tax credit against the U.S. income tax, generally up to the rate of the U.S. tax [2]. The worldwide tax burden has had an impact on the investment decisions of U.S. corporations (such as, in which foreign country to locate a particular business venture).

Certain countries imposed little or no tax on corporate income in 1980. For example, Bermuda had no corporate income tax [3]. However, Figure B shows that there were some foreign taxes (\$53 million) paid by CFC's in Bermuda. To an extent, these taxes were paid to other foreign countries by Bermudian CFC's doing business in those countries, in addition to doing business in Bermuda. For 1980, 20 percent of the CFC's incorporated in Bermuda reported another country as their principal place of business.

To attract investment, some countries singled out certain industries to receive special benefits. Liberia, for instance, had very

flexible tanker and other ship registration rules. In addition, Liberia generally did not tax foreign source income earned by CFC's. These shipping rules and tax benefits accounted for the large investment in the water transportation industry in Liberia. As shown in Figure A, this investment is indicated by the \$7.4 billion of assets in this industry, out of the total of \$8.8 billion of assets for all active Liberian CFC's [4].

Industries in other countries have received certain amounts of CFC investment which resulted in part from the tax incentives offered by the foreign countries. For instance, the Bahamas had CFC's with \$3.4 billion of assets engaged in the wholesale trade of petroleum and petroleum products, which produced \$30.7 billion of business receipts. For all active CFC's incorporated in the Bahamas, there were \$7.5 billion of assets and \$35.0 billion of business receipts. Further, there were large CFC investments in finance industries in Bermuda (\$8.4 billion of assets out of \$13.7 billion for all CFC's in this country), Hong Kong (\$5.0 billion out of \$8.3 billion), and the Netherlands Antilles (\$12.7 billion out of \$14.3 billion). For the Netherlands Antilles, the tax treaty with the United States which substantially exempted withholding taxes in the United States on interest payments that flowed to that country certainly added another reason for investment in finance CFC's [5].

Figure B shows the amount of taxes paid by CFC's as a percent of their earnings and profits, for selected countries. These percentages were the calculated "effective tax rates," which may vary considerably from the statutory tax rate(s) of the countries [6]. This is because (1) certain amounts of earnings and profits, and the associated foreign taxes paid, were applicable to operations in countries other than the "host" foreign country; (2) earnings and profits is an economic concept and does not necessarily equal the statutory tax base used; (3) many countries, such as France and West Germany, taxed various types of income at different rates; and (4) many countries, like the United States, had progressive tax rates.

Figure B also shows for 1980, that of the 19,523 CFC's which had positive earnings and profits, 4,879 or 25 percent paid no foreign income taxes. The types of taxes and methods of taxation used by foreign countries differed substantially, allowing many CFC's with positive earnings and profits to pay no income taxes due to the various provisions of the different tax structures.

#### GROWTH OF CFC ACTIVITY AROUND THE WORLD

In 1972 there were 29,221 CFC's [7] in the world with \$167.8 billion of assets, so that

Figure A.--Rates of Return and Profit Margins for Active Controlled Foreign Corporations, by Selected Countries of Incorporation and Primary Industries<sup>1</sup>

[Money amounts are in millions of dollars]

Country of incorporation and primary industry	Number of CFC's	Total assets	Business receipts	Earnings and profits after taxes	Rate of return <sup>2</sup>	Profit margin <sup>3</sup>
	(1)	(2)	(3)	(4)	(5)	(6)
All countries, total .....	29,107	\$505,821	\$699,003	\$31,181	6.16%	4.46%
Canada, total .....	4,280	89,696	100,773	5,143	5.73	5.10
Manufacturing .....	1,741	43,581	66,335	3,022	6.93	4.56
Brazil, total .....	1,125	18,488	25,617	691	3.74	2.70
Manufacturing .....	497	11,955	15,469	478	4.00	3.09
Mexico, total .....	1,010	8,486	11,883	933	10.99	7.85
Manufacturing .....	649	6,352	9,440	696	10.96	7.37
Panama, total .....	711	13,884	19,657	1,291	9.30	6.57
Finance .....	78	4,968	1,287	302	6.07	23.46
The Bahamas, total ....	192	7,515	34,952	279	3.71	0.80
Trade <sup>4</sup> .....	47	3,615	31,197	31	0.85	0.10
Bermuda, total .....	732	13,722	21,525	1,375	10.02	6.38
Finance .....	483	8,417	2,915	798	9.48	27.38
Netherlands Antilles, total .....	283	14,303	2,191	383	2.68	17.48
Finance .....	204	12,658	959	333	2.63	34.72
Belgium, total .....	761	14,306	22,314	704	4.92	3.15
Manufacturing .....	306	7,195	15,121	473	6.57	3.12
France, total .....	1,516	25,371	47,019	1,529	6.03	3.25
Manufacturing .....	648	16,788	32,666	1,069	6.36	3.27
Italy, total .....	835	19,620	28,492	1,367	6.97	4.79
Manufacturing .....	398	10,092	18,789	1,103	10.93	5.87
Netherlands, total ....	1,153	14,665	24,205	1,169	7.97	4.83
Manufacturing .....	402	7,673	15,124	570	7.43	3.77
Switzerland, total ....	1,049	17,170	29,704	1,640	9.55	5.52
Trade .....	341	7,460	23,488	1,050	14.08	4.47
United Kingdom, total .....	3,646	75,486	99,113	5,505	7.29	5.55
Manufacturing .....	1,366	36,868	55,544	2,582	7.00	4.65
West Germany, total ...	1,844	46,117	72,488	2,611	5.66	3.60
Manufacturing .....	802	25,376	40,053	1,310	5.16	3.27
Liberia, total .....	425	8,793	8,517	139	1.58	1.63
Water transpor- tation .....	266	7,416	7,286	93	1.25	1.28
Hong Kong, total .....	549	8,266	5,821	571	6.91	9.81
Finance .....	84	5,007	733	131	2.62	17.87
Japan, total .....	563	10,215	16,175	803	7.86	4.96
Trade .....	211	4,830	10,862	402	8.32	3.70
Australia, total .....	1,286	20,354	20,639	893	4.39	4.33
Manufacturing .....	491	8,715	11,026	420	4.82	3.81

<sup>1</sup>Primary industries determined by amount of assets.<sup>2</sup>Derived by column 4 divided by column 2.<sup>3</sup>Derived by column 4 divided by column 3.<sup>4</sup>Ninety-three percent of this trade was petroleum and petroleum products.

Figure B.--Controlled Foreign Corporations With and Without Foreign Income Taxes Paid on Positive Earnings and Profits, by Selected Areas and Countries of Incorporation

[Money amounts are in millions of dollars]

Selected areas and countries of incorporation	CFC's Paying Foreign Income Taxes				CFC's Paying No Foreign Income Taxes <sup>1</sup>	
	Number of CFC's	Earnings and profits (+)	Foreign income taxes	Taxes as a percent of earnings and profits (+)	Number of CFC's	Earnings and profits (+)
	(1)	(2)	(3)	(4)	(5)	(6)
All geographic areas, total .....	14,135	\$50,489	\$16,887	33%	4,879	\$4,516
Canada .....	2,403	8,387	3,286	39	613	385
Latin America, total .....	2,134	6,635	1,890	28	830	538
Brazil .....	427	1,483	481	32	151	74
Mexico .....	661	1,660	710	43	103	30
Panama (including Canal Zone) .....	179	1,351	133	10	187	145
Venezuela .....	238	511	154	30	53	22
Other Western Hemisphere, total .....	298	1,258	189	15	585	1,213
The Bahamas .....	34	181	45	25	97	201
Bermuda .....	90	559	53	9	433	986
Netherlands Antilles .....	170	465	68	15	42	22
Europe, total .....	6,320	26,534	8,841	33	1,858	1,519
Belgium .....	420	1,147	622	54	60	53
France (including Andorra) .....	807	2,779	1,012	36	163	68
Italy (including San Marino) .....	513	2,124	655	31	63	24
Netherlands .....	578	1,582	499	32	169	178
Switzerland .....	547	2,131	393	18	142	45
United Kingdom .....	1,504	8,587	2,722	32	617	731
West Germany .....	889	5,556	2,302	41	339	167
Africa, total .....	628	1,673	553	33	329	394
Liberia .....	28	194	21	11	222	303
South Africa (including South-west Africa) .....	377	895	273	31	79	60
Asia, total .....	1,286	3,866	1,361	35	371	371
Hong Kong .....	286	658	160	24	107	96
Japan .....	326	1,599	711	44	69	18
Oceania, total .....	835	1,897	708	37	239	82
Australia .....	700	1,727	646	37	197	59

<sup>1</sup>There were 510 additional CFC's with positive earnings and profits (\$789 million) and negative foreign income taxes (\$150 million).

although the number of CFC's in 1980 increased by only 21 percent to 35,471 (including inactive CFC's), the assets grew by 203 percent to \$508.0 billion. The volume of business receipts generated by CFC's grew even faster, skyrocketing by 305 percent, from \$172.4 billion in 1972 to \$699 billion in 1980. Even with a high rate of inflation (78 percent from 1972 to 1980 [8]) the increase in business receipts (sales and service income) was comparatively large. Many individual countries showed large dollar increases in CFC business receipts during this

same period, such as Canada from \$37.6 to \$100.8 billion, United Kingdom from \$20.4 to \$99.1 billion, West Germany \$15.9 to \$72.5 billion, and France from \$11.3 to \$47.0 billion.

The few countries which showed smaller business receipts for 1980 compared to 1972 were the East European Communist countries. CFC receipts in these countries fell from \$889 to \$29 million and the number of CFC's dropped from 42 to 18.

## CFC'S BALANCE OF TRADE

For 1980, the overall "CFC balance of trade" with U.S. parent companies (including their domestic subsidiaries) produced a surplus of \$24.9 billion for the United States, with CFC purchases of stock in trade from U.S. parents of \$87.7 billion and sales to these U.S. parents of \$62.8 billion. In comparison, the United States was in an overall deficit trade position (\$24.1 billion) for 1980, with \$244.9 billion of imports and only \$220.8 billion of exports [9].

Figure C shows the U.S. 1980 balance of trade with selected foreign countries, and the sales and purchases of stock in trade between CFC's in those selected countries and their U.S.

parent companies. Certain comparisons between CFC activity in a particular country and the U.S. balance of trade with that country must be qualified. For instance, CFC's in the Bahamas reported greater sales (column 2) than the U.S. imports (column 5) from this country. This is partially explained by the difference in how U.S. Bureau of Census' statistics and CFC data are tabulated on a country basis. Census' statistics credit U.S. imports to the country of origin while CFC sales are based on the CFC's country of incorporation. The CFC sales to U.S. parent companies from the Bahamas included wholesale trade of such goods as petroleum and petroleum products. However, these CFC sales from the Bahamas were mainly attributable to CFC's being incorporated there to take advantage of the no-tax structure for

Figure C.--U.S. Balance of Trade, Purchases and Sales of Stock in Trade Between CFC's and Their Domestic Parents, for Selected Areas and Countries of Incorporation

[Millions of dollars]

Selected areas and countries of incorporation	CFC purchases from U.S. parents	CFC sales to U.S. parents	CFC balance of trade	U.S. Balance of Trade		
				Exports	Imports	Surplus or deficit
	(1)	(2)	(3)	(4)	(5)	(6)
All geographic areas, total .....	\$87,664	\$62,782	\$24,882	\$220,783	\$244,871	\$-24,100
Canada .....	15,318	10,984	4,334	35,395	41,459	-6,064
Latin America, total .....	7,853	2,517	5,336	36,030	29,952	6,078
Brazil .....	715	160	555	4,343	3,715	628
Mexico .....	1,030	502	528	15,145	12,580	2,565
Panama (including Canal Zone) .....	3,666	500	3,166	699	330	369
Other Western Hemisphere, total .....	6,946	30,879	-23,933	2,688	7,277	-4,589
The Bahamas .....	2,923	23,236	-20,313	396	1,469	-1,073
Bermuda .....	3,186	6,786	-3,600	136	13	123
Netherlands Antilles .....	828	852	-24	448	2,564	-2,116
Europe, total .....	40,626	6,966	33,660	72,230	48,503	23,727
United Kingdom .....	6,518	2,072	4,446	12,694	9,842	2,852
West Germany .....	12,294	1,456	10,838	10,960	11,693	-733
Africa, total .....	2,590	1,451	1,139	9,060	34,410	-25,350
Liberia .....	1,753	629	1,124	113	128	-15
Nigeria .....	36	506	-470	1,150	11,105	-9,955
South Africa (including South-West Africa) .....	429	23	406	2,463	3,321	-858
Asia, total .....	7,940	5,615	2,325	60,168	80,299	-20,131
Singapore .....	1,432	2,016	-584	3,033	1,921	1,112
Hong Kong .....	1,524	534	990	2,686	4,739	-2,053
Japan .....	1,205	572	633	20,790	30,714	-9,924
Oceania .....	2,882	288	2,594	4,876	3,392	1,484

corporate income, while the origin of the petroleum was not in the Bahamas. An additional qualification in comparing the statistics deals with timing. Census' data are based on the physical movement of goods for the 1980 Calendar Year, while CFC data are based on sales as reported for accounting periods beginning as early as September 1978 and ending as late as June 1981.

#### SUMMARY

Investment decisions by U.S. corporations concerning activity in foreign countries were generally based on both economic and taxation considerations. Overseas investments by U.S. corporations were often in the form of businesses incorporated in foreign countries but controlled by the U.S. parents, i.e., CFC's. For 1980, U.S. corporations invested in 35,471 CFC's, which had assets of \$508 billion. When CFC's were used, the U.S. tax effect to the parent corporations and the tax laws of the foreign countries in which the CFC's were located were important considerations [10].

Controlled Foreign Corporations have made a noticeable impact on the economies of many countries. They generated throughout the world nearly \$700 billion in business receipts in 1980, with \$47.6 billion of earnings and profits. Additionally, CFC's paid \$16.4 billion in income taxes to foreign governments, and remitted \$10.7 billion in dividends to their U.S. parent corporations.

#### DATA SOURCES AND LIMITATIONS

##### Sample Selection and Variability

The statistics for the 1980 Tax Year were estimated from a stratified probability sample of about 85,000 U.S. corporation income tax returns selected after revenue processing but before audit. A description of the sample selection procedures for corporate returns is presented in the Appendix.

From the general corporate sample described above, all returns containing Forms 2952 were used for the 1980 statistics presented in this article. The weighting factor used for each return was the same factor used for the U.S. parent corporation. The weighting factors used for the 1980 study resulted in an estimated 4,799 corporate returns, containing information for 35,471 CFC's.

Sampling variability (i.e., the degree to which statistics based on a sample differ from data based on similar samples) occurs only in strata in which returns were selected at a rate of less than 100 percent. For this article, returns selected at the 100 percent rate accounted for the largest part of the estimated

amounts. For instance, for 1980, CFC's owned by U.S. corporations with \$250 million or more in total assets (and selected at a 100 percent rate) accounted for the major portion of total assets (94.1 percent), business receipts (93.3 percent), and current earnings and profits (93.4 percent) of CFC's owned by all corporations. Because of the predominance of large companies, sampling variability is not considered a major limitation of the statistics.

##### Nonsampling Limitations

Controlled Foreign Corporations were classified by country of incorporation and principal place of business. The Form 2952 specified that the CFC designate the country from which the largest portion of gross receipts was derived as the principal place of business. Because the largest portion will vary, from one CFC to another, an undetermined amount of business was conducted with countries other than the country of principal place of business. Additionally, the term "country" used in this article includes not only countries, but also other separate taxation authorities, such as possessions.

About 50 U.S. corporations filed consolidated Controlled Foreign Corporation schedules, with the data aggregated for several companies. Follow-up requests were made in an attempt to get the individual CFC information. About 75 percent of these requests were successful. A part of the remaining data fell into the correct classification by country because all of the CFC's reported on that particular return were in the same country. The few remaining unresolved consolidated CFC's were left in the same country classification as the CFC showing the consolidated data.

##### Time Period Covered

The 1980 estimates are based on data from returns filed by U.S. corporations with accounting periods that were for full years ending any time between July 1980 through June 1981. In addition to these returns filed for 12-month accounting periods, the statistics also include data from part-year returns (filed for accounting periods ending during the same time period by corporations which were new, merging, liquidating or simply changing their accounting periods). Because Forms 2952 were filed for the accounting periods of CFC's ending with, or within the accounting periods of the U.S. parent corporations, the CFC accounting periods covered by the statistics may have ended any time during the period August 1979 through June 1981; however, most of the activity was deemed to have occurred during 1980.

## EXPLANATION OF SELECTED TERMS

Business Receipts of Controlled Foreign Corporations.--Business receipts were, in general, gross receipts or gross sales less returns and allowances reported for CFC's on Forms 2952. In the finance, insurance, and real estate industries, business receipts were generally the total income or receipts of the CFC and may have included other types of income such as interest, royalties, rents, and other investment income. This definition differs from that used for business receipts statistics for domestic corporations, in that investment income is normally excluded.

CFC Balance of Trade.--This term is used to describe the excess of CFC sales to U.S. parents or purchases from U.S. parents. A surplus for the U.S. occurs when CFC purchases exceed sales to U.S. parents and a deficit for the U.S. results from an excess of sales to U.S. parents.

Current Earnings and Profits of Controlled Foreign Corporations.--This item represents the difference between the accumulated beginning and ending year balances of earnings and profits available for distribution to the stockholders. The earnings and profits of a foreign corporation must be calculated under U.S. accounting standards, as required by IRS regulations. This calculation is such that earnings and profits closely conforms to the economic income, as opposed to the taxable income, of the foreign corporation.

Foreign Base Company Income.--This part of Subpart F income included foreign personal holding company income ("passive" investment income), and foreign base company sales, services, and shipping income.

Foreign Income Taxes Paid by Controlled Foreign Corporations.--These were foreign income, war profits, and excess profits taxes paid or accrued by CFC's to foreign countries or U.S. possessions (including Puerto Rico). Also included were taxes imposed by other countries (including the United States) in cases where CFC's had business operations in countries other than the one in which they were incorporated.

Principal Place of Business.--The Form 2952 instructs the taxpayer to name the "principal cities and countries where business is conducted," meaning those places of business from which the largest portion of gross receipts was derived.

Profit Margin.--This ratio is the result of dividing current earnings and profits after taxes by business receipts.

Rate of Return.--This ratio is the result of dividing the current earnings and profits after taxes of a CFC by its assets.

Sales and Purchases of Stock in Trade.--These were sales and purchases of merchandise in the ordinary course of trade or business. Only sales and purchases between CFC's and their U.S. parents (including their domestic subsidiaries) were used in this article.

U.S. Balance of Trade.--This is the excess of exports over imports resulting in a surplus, or the excess of imports over exports resulting in a deficit or negative balance of trade.

## NOTES AND REFERENCES

- [1] Nearly all CFC's are controlled by U.S. corporations, as opposed to other types of U.S. "persons" (estates, partnerships, etc.). Data contained in this article represent only those CFC's controlled by U.S. corporations. See Gianelos, Arthur, and Sutton, William, "Controlled Foreign Corporations, 1980," Statistics of Income Bulletin, Spring 1984, pp. 37-57.
- [2] See States, William, "Corporate Foreign Tax Credits, 1980: An Industry Focus," Statistics of Income Bulletin, Summer 1984, for a more complete discussion of foreign tax credits.
- [3] Other countries with certain low or no tax provisions included the Bahamas, Cayman Islands, Bahrain, New Hebrides, Netherlands Antilles, Gibraltar, Nauru, Turks and Caicos Islands, British Virgin Islands, Jersey (Channel Islands), Liechtenstein, Switzerland, Costa Rica, Hong Kong, Liberia, Panama, Philippines, Antigua, Barbados, Grenada, St. Vincent, Luxembourg, and the Netherlands. See Reiner, Wayne R., Taxation for Accountants, 23 October 1979, pp. 240-246. Additionally, countries such as the United Kingdom offered tax incentives other than low tax rates. These incentives included such items as large depreciation allowances on property. See Corporate Taxes, A Worldwide Summary, Price Waterhouse, October 1980.
- [4] Additional 1980 CFC data cross-classified by country and industry are available by request from the Statistics of Income Division, D:R:S, Internal Revenue Service, Washington, DC 20224.
- [5] See Carson, Chris R., "Nonresident Alien Income and Tax Withheld, 1982," Statistics of Income Bulletin, Fall 1984, for more information on tax treaties.
- [6] It should be noted that while Figure B shows an effective tax rate for all CFC's in a particular country (for example, the United Kingdom had a rate of 28 percent), many CFC's in that country had much lower or higher effective tax rates. For



instance, of the 2,281 CFC's with positive earnings and profits in the United Kingdom, 526 paid at an effective tax rate of 50 percent or more. Table 2 of this article shows effective tax rate groupings for selected countries.

- [7] Previous SOI studies showed that in 1962 there were 12,073 CFC's, 1965 had 17,668, 1966 reported 19,617 and in 1968 there were 20,895. For further details, see Statistics of Income, Supplemental Reports, Foreign Income and Taxes (1962, 1965, and 1966), and International Income and Taxes (1968).

- [8] U.S. Department of Commerce, Bureau of Economic Analysis, Survey of Current Business, July 1983, Vol. 63, No. 7, p. 80.

- [9] U.S. Department of Commerce, Bureau of the Census, Highlights of U.S. Export and Import Trade, FT 990, monthly; and unpublished data.

- [10] For an additional reference on this subject, see also Frisch, Daniel J. and Hartman, David G., Taxation and the Location of U.S. Investment Abroad, National Bureau of Economic Research, Working Paper No. 1241, November 1983.

## Controlled Foreign Corporations, 1980

Table 1.—Number of U.S. Corporation Returns and Number, Total Assets, Receipts, Earnings, Taxes, and Distributions of Controlled Foreign Corporations, by Selected Country of Incorporation and Size of Total Assets of Controlled Foreign Corporation

(All figures are estimates based on samples—money amounts are in thousands of dollars)

Selected country of incorporation and size of total assets of Controlled Foreign Corporation	Number of U.S. corporation returns	Controlled Foreign Corporations								Distributions	
		Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign corporations with current earnings and profits (+) before taxes		Foreign income taxes (net)		Total	Out of current earnings and profits
						Current earnings and profits before taxes	Foreign income taxes (net)				
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)		(9)	(10)
<b>All Geographic Areas, total</b> .....	<b>4,799</b>	<b>35,471</b>	<b>508,031,994</b>	<b>699,003,002</b>	<b>47,621,582</b>	<b>55,794,508</b>	<b>16,736,730</b>	<b>16,440,451</b>		<b>14,115,642</b>	<b>9,643,638</b>
Assets zero or not reported.....	1,517	5,087	—	878,004	269,589	313,116	19,993	18,287		131,322	46,098
\$1 under \$1,000,000.....	3,306	13,067	3,392,994	7,606,219	1,317,794	1,903,729	683,698	660,264		195,975	87,586
\$1,000,000 under \$10,000,000.....	2,427	11,134	42,300,419	67,113,551	4,603,973	5,952,080	1,886,408	1,837,308		1,371,999	849,525
\$10,000,000 under \$100,000,000.....	1,072	5,312	156,642,322	222,228,352	16,949,095	19,440,360	5,923,083	5,821,787		4,745,699	3,495,028
\$100,000,000 or more.....	247	870	305,696,259	401,176,877	24,481,131	28,185,223	8,223,548	8,102,804		7,670,647	5,165,401
<b>Canada.....</b>	<b>2,527</b>	<b>5,415</b>	<b>90,043,610</b>	<b>100,773,346</b>	<b>8,285,453</b>	<b>8,963,459</b>	<b>3,251,184</b>	<b>3,142,670</b>		<b>1,987,908</b>	<b>1,558,742</b>
Assets zero or not reported.....	623	899	—	160,451	131,470	138,766	—	7,986		7,629	5,014
\$1 under \$1,000,000.....	1,312	2,065	524,606	1,188,839	49,272	88,771	28,951	27,425		23,039	9,499
\$1,000,000 under \$10,000,000.....	1,063	1,567	5,599,545	10,054,137	771,175	854,720	326,772	322,987		184,270	101,323
\$10,000,000 under \$100,000,000.....	483	723	22,110,818	29,601,527	2,915,444	3,147,177	1,060,521	1,045,822		621,505	480,986
\$100,000,000 or more.....	116	162	61,808,642	58,768,392	4,418,092	4,734,024	1,841,499	1,754,421		1,151,466	961,920
<b>Latin America, total</b> .....	<b>1,504</b>	<b>5,910</b>	<b>63,574,969</b>	<b>81,021,279</b>	<b>4,935,978</b>	<b>7,218,439</b>	<b>1,883,281</b>	<b>1,899,571</b>		<b>1,427,837</b>	<b>1,102,064</b>
Assets zero or not reported.....	425	908	—	55,212	453	12,314	1,816	2,179		4,363	1,102
\$1 under \$1,000,000.....	1,029	2,340	556,932	1,025,338	9,554	107,412	23,646	23,345		26,225	13,885
\$1,000,000 under \$10,000,000.....	636	1,766	6,900,850	8,341,412	813,247	1,051,129	331,661	330,867		188,222	132,123
\$10,000,000 under \$100,000,000.....	321	789	22,345,758	30,326,753	2,683,887	3,179,012	895,161	894,970		764,699	589,435
\$100,000,000 or more.....	62	107	33,771,429	12,722,565	1,428,837	2,868,573	630,997	648,211		444,059	365,518
<b>Brazil.....</b>	<b>687</b>	<b>1,330</b>	<b>18,714,994</b>	<b>25,617,128</b>	<b>1,183,736</b>	<b>1,566,973</b>	<b>479,521</b>	<b>492,684</b>		<b>319,325</b>	<b>233,104</b>
Assets zero or not reported.....	123	173	—	13,638	—	1,220	130	—		—	—
\$1 under \$1,000,000.....	398	534	112,050	182,016	—	31,526	6,195	6,445		3,018	2,299
\$1,000,000 under \$10,000,000.....	267	382	1,531,306	1,636,423	79,288	169,682	53,376	53,685		25,500	18,840
\$10,000,000 under \$100,000,000.....	140	200	6,240,842	6,442,064	345,064	526,443	140,711	139,623		99,085	75,327
\$100,000,000 or more.....	34	41	10,830,795	17,336,988	778,989	838,102	279,109	292,800		191,721	136,638
<b>Ecuador.....</b>	<b>63</b>	<b>87</b>	<b>272,444</b>	<b>336,736</b>	<b>24,430</b>	<b>28,237</b>	<b>4,606</b>	<b>4,616</b>		<b>5,290</b>	<b>4,988</b>
Assets zero or not reported.....	6	7	—	506	—	—	—	—		—	—
\$1 under \$1,000,000.....	35	39	16,869	13,460	—	582	128	128		38	—
\$1,000,000 under \$10,000,000.....	26	32	141,139	147,670	12,405	15,231	2,849	2,864		2,334	2,069
\$10,000,000 under \$100,000,000.....	9	9	114,436	175,100	12,422	12,423	1,629	1,629		2,919	2,919
\$100,000,000 or more.....	—	—	—	—	—	—	—	—		—	—
<b>Mexico.....</b>	<b>632</b>	<b>1,249</b>	<b>8,520,743</b>	<b>11,883,394</b>	<b>1,638,105</b>	<b>1,692,600</b>	<b>709,214</b>	<b>705,451</b>		<b>241,003</b>	<b>188,643</b>
Assets zero or not reported.....	126	183	—	9,160	5,952	6,356	1,602	1,682		54	—
\$1 under \$1,000,000.....	344	490	122,115	275,617	18,939	26,548	9,366	9,702		4,456	2,187
\$1,000,000 under \$10,000,000.....	298	411	1,675,433	2,118,987	303,040	331,869	138,021	135,701		36,186	29,024
\$10,000,000 under \$100,000,000.....	124	152	4,137,266	5,007,143	902,247	919,901	383,937	382,079		136,987	105,346
\$100,000,000 or more.....	12	13	2,585,929	4,472,487	407,926	407,926	176,287	176,287		63,320	52,086
<b>Panama (Including Canal Zone).....</b>	<b>422</b>	<b>921</b>	<b>13,952,464</b>	<b>19,857,203</b>	<b>1,427,229</b>	<b>1,502,321</b>	<b>132,790</b>	<b>136,160</b>		<b>347,957</b>	<b>251,745</b>
Assets zero or not reported.....	105	217	—	26,617	—	1,234	16	16		1,458	66
\$1 under \$1,000,000.....	230	377	72,977	86,911	5,139	15,067	997	947		10,385	5,671
\$1,000,000 under \$10,000,000.....	132	199	798,674	957,878	118,196	131,886	22,237	22,740		44,956	22,612
\$10,000,000 under \$100,000,000.....	83	107	3,104,708	5,957,724	389,448	437,293	70,981	71,741		176,714	114,305
\$100,000,000 or more.....	18	21	9,976,105	12,628,073	914,580	916,841	38,559	40,715		114,444	109,091
<b>Venezuela.....</b>	<b>248</b>	<b>494</b>	<b>4,588,308</b>	<b>5,850,745</b>	<b>411,523</b>	<b>538,498</b>	<b>153,759</b>	<b>155,972</b>		<b>127,562</b>	<b>103,979</b>
Assets zero or not reported.....	52	63	—	31	645	651	15	15		1,773	636
\$1 under \$1,000,000.....	101	146	34,377	58,915	3,449	7,307	912	953		1,992	451
\$1,000,000 under \$10,000,000.....	117	183	720,710	882,541	91,918	103,418	28,231	28,170		23,390	19,323
\$10,000,000 under \$100,000,000.....	72	95	2,465,372	2,975,627	325,065	352,469	108,425	109,292		92,667	79,809
\$100,000,000 or more.....	7	7	1,367,848	1,933,630	—	74,652	16,176	17,543		7,739	3,760
<b>All Other Latin America.....</b>	<b>615</b>	<b>1,829</b>	<b>17,526,016</b>	<b>17,676,073</b>	<b>250,954</b>	<b>1,889,810</b>	<b>403,392</b>	<b>404,689</b>		<b>386,700</b>	<b>319,604</b>
Assets zero or not reported.....	161	266	—	5,260	458	2,853	52	339		1,079	400
\$1 under \$1,000,000.....	398	753	198,543	402,419	—	26,382	6,048	5,170		6,395	3,277
\$1,000,000 under \$10,000,000.....	277	560	2,033,589	2,597,913	208,400	299,042	86,947	87,708		55,855	40,255
\$10,000,000 under \$100,000,000.....	141	226	6,283,133	9,769,094	709,641	930,483	189,479	190,606		256,597	211,729
\$100,000,000 or more.....	21	25	9,010,751	4,901,387	—	631,051	120,866	120,866		66,835	63,943
<b>Other Western Hemisphere, total</b> .....	<b>740</b>	<b>1,462</b>	<b>38,275,340</b>	<b>59,033,035</b>	<b>2,257,408</b>	<b>2,507,347</b>	<b>186,255</b>	<b>184,951</b>		<b>943,353</b>	<b>379,426</b>
Assets zero or not reported.....	132	175	—	99,481	22,514	24,292	—	—		77,985	21,395
\$1 under \$1,000,000.....	323	447	109,934	343,640	4,309	29,891	3,035	1,971		28,530	6,081
\$1,000,000 under \$10,000,000.....	348	430	1,776,923	1,287,991	148,983	204,951	10,742	10,710		36,431	20,496
\$10,000,000 under \$100,000,000.....	242	325	10,409,722	6,801,314	832,967	878,913	55,122	54,305		306,954	141,150
\$100,000,000 or more.....	56	85	25,978,762	50,500,610	1,250,635	1,369,299	117,777	118,396		493,454	190,304
<b>The Bahamas.....</b>	<b>146</b>	<b>260</b>	<b>7,524,769</b>	<b>34,951,662</b>	<b>322,780</b>	<b>395,921</b>	<b>43,968</b>	<b>43,511</b>		<b>159,694</b>	<b>75,924</b>
Assets zero or not reported.....	35	50	—	615	86	613	21	21		54,491	593
\$1 under \$1,000,000.....	66	83	20,807	43,959	747	4,646	24	24		2,348	1,409
\$1,000,000 under \$10,000,000.....	54	67	250,618	324,413	5,223	21,996	2,293	2,536		6,304	4,468
\$10,000,000 under \$100,000,000.....	**49	**61	**7,253,345	**34,582,674	**316,723	**368,666	**41,631	**40,931		**96,551	**69,454
\$100,000,000 or more.....	**	**	**	**	**	**	**	**		**	**
<b>Bermuda.....</b>	<b>498</b>	<b>821</b>	<b>14,131,863</b>	<b>21,525,395</b>	<b>1,427,284</b>	<b>1,566,404</b>	<b>52,037</b>	<b>51,859</b>		<b>372,378</b>	<b>191,796</b>
Assets zero or not reported.....	60	77	—	96,780	20,274	21,521	—	—		23,482	20,802
\$1 under \$1,000,000.....	199	252	69,757	255,771	3,861	19,259	1,625	1,640		10,064	2,689
\$1,000,000 under \$10,000,000.....	255	295	1,211,261	787,300	122,123	156,740	5,987	5,728		27,874	14,158
\$10,000,000 under \$100,000,000.....	135	165	4,513,976	4,427,562	514,384	530,053	18,963	19,029		135,023	61,935
\$100,000,000 or more.....	23	32	8,336,869	15,957,982	766,642	838,832	25,965	25,965		175,936	92,212

Footnotes at end of table.

**Table 1.—Number of U.S. Corporation Returns and Number, Total Assets, Receipts, Earnings, Taxes, and Distributions of Controlled Foreign Corporations, by Selected Country of Incorporation and Size of Total Assets of Controlled Foreign Corporation—Continued**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Selected country of incorporation and size of total assets of Controlled Foreign Corporation	Number of U.S. corporation returns	Controlled Foreign Corporations								Distributions	
		Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign corporations with current earnings and profits (+) before taxes		Foreign income taxes (net)			
						Current earnings and profits before taxes	Foreign income taxes (net)		Total	Out of current earnings and profits	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	
<b>Other Western Hemisphere (continued)</b>											
Netherlands Antilles	260	345	14,311,863	2,190,820	450,512	487,332	68,374	67,704	405,521	111,706	
Assets zero or not reported	37	39	—	2,020	2,089	2,093	61	50	12	—	
\$1 under \$1,000,000	83	101	17,994	39,299	-800	5,405	1,386	307	16,118	1,983	
\$1,000,000 under \$10,000,000	57	58	276,524	147,893	18,086	23,887	2,440	2,423	2,253	1,869	
\$10,000,000 under \$100,000,000	99	108	4,056,520	356,739	147,692	162,975	17,972	18,270	109,103	41,947	
\$100,000,000 or more	31	39	9,960,825	1,644,869	283,445	292,973	46,515	46,654	278,036	65,907	
All Other Western Hemisphere	30	36	2,306,844	365,157	56,831	57,690	21,877	21,877	5,759	—	
Assets zero or not reported	9	9	—	65	65	—	—	—	—	—	
\$1 under \$1,000,000	12	12	1,375	4,611	501	582	1	1	—	—	
\$1,000,000 under \$10,000,000	10	10	38,520	28,384	1,551	2,328	23	23	—	—	
\$10,000,000 under \$100,000,000	**4	**5	**2,266,949	**332,097	**54,714	**54,715	**21,853	**21,853	**5,759	**	
\$100,000,000 or more	**	**	**	**	**	**	**	**	**	**	
<b>Europe, total</b>	<b>2,347</b>	<b>15,757</b>	<b>241,807,390</b>	<b>364,600,765</b>	<b>24,451,202</b>	<b>28,445,004</b>	<b>8,747,070</b>	<b>8,549,258</b>	<b>7,625,785</b>	<b>5,109,621</b>	
Assets zero or not reported	665	2,147	—	420,072	66,847	83,741	20,216	19,574	21,638	9,046	
\$1 under \$1,000,000	1,597	5,575	1,509,897	3,702,216	1,285,138	1,540,823	595,183	588,705	79,351	36,441	
\$1,000,000 under \$10,000,000	1,404	5,144	19,641,948	35,424,332	7,720,369	2,492,512	818,624	776,205	665,966	397,870	
\$10,000,000 under \$100,000,000	660	2,500	75,612,901	123,275,380	7,190,310	8,650,360	2,770,413	2,684,872	2,287,139	1,660,775	
\$100,000,000 or more	160	392	145,042,644	201,778,764	14,188,537	15,677,568	4,542,633	4,479,902	4,571,692	3,005,489	
<b>Austria</b>	<b>210</b>	<b>291</b>	<b>2,488,082</b>	<b>3,847,721</b>	<b>157,297</b>	<b>210,283</b>	<b>76,543</b>	<b>75,233</b>	<b>68,836</b>	<b>56,074</b>	
Assets zero or not reported	16	21	—	—	1,096	1,114	410	410	—	—	
\$1 under \$1,000,000	106	122	38,154	86,455	643	5,494	2,371	2,379	832	487	
\$1,000,000 under \$10,000,000	94	110	367,532	726,740	8,231	45,366	21,142	21,329	13,466	8,437	
\$10,000,000 under \$100,000,000	27	31	712,794	1,234,137	59,859	70,842	23,118	21,611	19,192	17,109	
\$100,000,000 or more	7	7	1,369,602	1,800,389	87,468	87,468	29,503	29,503	35,347	30,041	
<b>Belgium</b>	<b>540</b>	<b>835</b>	<b>14,316,653</b>	<b>22,313,903</b>	<b>1,323,109</b>	<b>1,504,889</b>	<b>621,287</b>	<b>619,190</b>	<b>350,551</b>	<b>251,489</b>	
Assets zero or not reported	60	64	—	79,104	14,959	17,140	3,402	3,402	—	—	
\$1 under \$1,000,000	209	261	78,692	207,293	1,512	14,131	5,306	5,435	1,773	1,111	
\$1,000,000 under \$10,000,000	272	336	1,264,512	2,310,083	120,866	158,366	63,867	62,968	51,500	21,845	
\$10,000,000 under \$100,000,000	129	155	5,009,643	8,699,026	452,125	559,030	247,048	245,708	87,271	58,614	
\$100,000,000 or more	20	20	7,963,807	11,018,396	733,647	756,221	301,664	301,676	210,006	169,919	
<b>Denmark</b>	<b>170</b>	<b>261</b>	<b>1,985,507</b>	<b>4,370,427</b>	<b>114,678</b>	<b>167,398</b>	<b>58,680</b>	<b>55,745</b>	<b>56,601</b>	<b>42,625</b>	
Assets zero or not reported	13	13	—	—	-76	—	—	—	—	—	
\$1 under \$1,000,000	83	104	35,922	116,402	-3,603	2,585	1,019	899	1,284	355	
\$1,000,000 under \$10,000,000	81	117	391,704	886,076	16,921	37,764	12,384	11,052	10,725	3,416	
\$10,000,000 under \$100,000,000	22	24	777,001	1,316,441	19,537	45,151	11,979	10,495	14,645	8,909	
\$100,000,000 or more	3	3	780,881	2,051,508	81,899	81,899	33,298	33,298	29,946	29,946	
<b>France (Including Andorra)</b>	<b>814</b>	<b>1,651</b>	<b>25,390,429</b>	<b>47,018,919</b>	<b>2,531,162</b>	<b>2,885,643</b>	<b>1,008,759</b>	<b>1,002,298</b>	<b>607,177</b>	<b>489,848</b>	
Assets zero or not reported	99	155	—	29,989	9,657	11,493	4,179	3,608	1,321	1,125	
\$1 under \$1,000,000	382	514	177,111	405,344	3,104	29,619	10,466	9,729	3,062	1,734	
\$1,000,000 under \$10,000,000	404	619	2,291,934	4,310,391	168,463	253,665	102,703	100,562	44,470	28,683	
\$10,000,000 under \$100,000,000	214	315	8,944,254	15,412,650	905,446	1,025,938	430,602	429,827	223,627	166,434	
\$100,000,000 or more	44	48	13,977,130	26,860,546	1,444,292	1,564,928	460,808	458,573	334,697	291,872	
<b>Italy (Including San Marino)</b>	<b>568</b>	<b>995</b>	<b>19,695,832</b>	<b>28,491,905</b>	<b>2,019,830</b>	<b>2,163,618</b>	<b>652,811</b>	<b>652,417</b>	<b>569,046</b>	<b>470,115</b>	
Assets zero or not reported	80	97	—	33,007	13,212	13,236	5,169	5,169	460	453	
\$1 under \$1,000,000	275	324	82,925	163,644	12,358	19,415	6,122	6,113	5,595	2,815	
\$1,000,000 under \$10,000,000	245	330	1,362,571	2,149,919	109,248	138,338	55,505	54,820	32,472	23,228	
\$10,000,000 under \$100,000,000	148	216	6,223,558	9,391,936	631,544	719,803	222,222	222,523	214,682	154,741	
\$100,000,000 or more	22	28	12,026,779	16,753,399	1,253,469	1,272,827	363,792	363,792	315,838	288,878	
<b>Luxembourg</b>	<b>67</b>	<b>97</b>	<b>3,446,872</b>	<b>1,130,897</b>	<b>136,136</b>	<b>139,293</b>	<b>36,898</b>	<b>37,150</b>	<b>34,599</b>	<b>30,739</b>	
Assets zero or not reported	9	12	—	—	-85	229	1	1	—	—	
\$1 under \$1,000,000	27	33	9,800	12,134	2,381	2,719	502	542	398	398	
\$1,000,000 under \$10,000,000	18	22	85,812	82,406	6,264	6,495	1,721	1,804	437	281	
\$10,000,000 under \$100,000,000	18	22	721,217	573,101	87,632	89,906	26,850	26,979	15,964	12,786	
\$100,000,000 or more	8	8	2,630,043	463,256	39,945	39,945	7,824	7,824	17,799	17,274	
<b>Netherlands</b>	<b>633</b>	<b>1,333</b>	<b>14,721,585</b>	<b>24,205,913</b>	<b>1,620,837</b>	<b>1,787,768</b>	<b>483,122</b>	<b>451,671</b>	<b>440,795</b>	<b>328,810</b>	
Assets zero or not reported	110	161	—	61,406	7,675	8,401	2,655	2,553	1,331	1,311	
\$1 under \$1,000,000	307	481	135,238	307,864	12,590	29,971	6,665	5,856	7,443	2,847	
\$1,000,000 under \$10,000,000	316	457	1,737,004	3,111,599	194,341	255,411	80,922	73,481	77,207	42,035	
\$10,000,000 under \$100,000,000	147	206	6,304,624	9,561,164	701,771	778,674	213,723	209,409	195,201	166,598	
\$100,000,000 or more	23	28	6,544,719	11,163,880	704,460	715,310	179,157	160,373	159,605	116,019	
<b>Spain</b>	<b>307</b>	<b>513</b>	<b>7,064,117</b>	<b>9,238,146</b>	<b>304,529</b>	<b>581,104</b>	<b>122,151</b>	<b>123,158</b>	<b>165,924</b>	<b>135,397</b>	
Assets zero or not reported	50	54	—	2,115	255	339	—	—	—	—	
\$1 under \$1,000,000	110	144	35,491	59,205	-2,994	2,994	634	755	1,848	45	
\$1,000,000 under \$10,000,000	157	200	822,586	1,199,452	10,309	56,460	17,261	17,730	20,666	12,437	
\$10,000,000 under \$100,000,000	80	102	2,842,318	4,105,343	171,334	288,331	66,573	66,991	96,953	84,616	
\$100,000,000 or more	13	13	3,363,721	3,872,031	125,625	232,980	37,683	37,683	46,456	38,299	
<b>Sweden</b>	<b>272</b>	<b>481</b>	<b>3,964,935</b>	<b>6,628,259</b>	<b>329,215</b>	<b>397,499</b>	<b>121,689</b>	<b>114,609</b>	<b>83,156</b>	<b>67,252</b>	
Assets zero or not reported	37	66	—	3,898	377	603	355	355	375	126	
\$1 under \$1,000,000	137	198	43,374	111,033	-419	5,007	1,984	1,946	2,144	504	
\$1,000,000 under \$10,000,000	133	159	556,982	1,106,097	24,033	48,940	19,994	19,429	15,545	7,603	
\$10,000,000 under \$100,000,000	37	52	1,777,761	2,746,832	88,625	126,349	36,026	29,550	39,246	33,174	
\$100,000,000 or more	6	6	1,586,819	2,660,400	216,599	216,599	63,330	63,330	25,845	25,845	

Footnotes at end of table.

## Controlled Foreign Corporations, 1980

Table 1.—Number of U.S. Corporation Returns and Number, Total Assets, Receipts, Earnings, Taxes, and Distributions of Controlled Foreign Corporations, by Selected Country of Incorporation and Size of Total Assets of Controlled Foreign Corporation—Continued

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Selected country of incorporation and size of total assets of Controlled Foreign Corporation	Number of U.S. corporation returns	Controlled Foreign Corporations							Distributions	
		Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign corporations with current earnings and profits (+) before taxes		Foreign income taxes (net)	Total	Out of current earnings and profits
						Current earnings and profits before taxes	Foreign income taxes (net)			
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	
<b>Europe (continued)</b>										
Switzerland	605	1,122	17,175,638	29,704,272	2,030,810	2,186,519	390,631	391,094	637,569	411,972
Assets zero or not reported	72	90	—	12,511	2,298	2,601	383	383	4,733	21
\$1 under \$1,000,000	331	443	125,282	486,846	9,733	29,117	5,653	5,762	13,329	4,743
\$1,000,000 under \$10,000,000	269	360	1,417,495	1,827,152	173,679	210,043	44,169	42,773	95,528	56,859
\$10,000,000 under \$100,000,000	141	197	5,740,108	8,061,988	525,979	596,998	116,217	117,089	239,483	154,008
\$100,000,000 or more	29	33	9,892,754	19,215,775	1,319,121	1,347,760	224,208	225,087	284,497	196,341
United Kingdom	1,557	5,031	75,916,888	99,112,663	8,033,716	9,540,775	2,658,360	2,528,236	2,121,430	1,669,179
Assets zero or not reported	401	1,052	—	146,487	14,594	23,310	2,836	2,927	11,726	5,550
\$1 under \$1,000,000	823	1,787	406,974	796,459	1,271,286	1,334,983	533,257	529,498	20,982	8,797
\$1,000,000 under \$10,000,000	796	1,382	5,351,633	8,933,690	536,624	731,595	213,442	188,931	129,459	88,377
\$10,000,000 under \$100,000,000	391	678	21,725,082	32,500,662	1,650,455	2,210,344	660,470	597,127	497,732	353,878
\$100,000,000 or more	98	132	48,433,199	56,735,366	4,560,758	5,240,543	1,248,355	1,209,753	1,461,531	1,212,637
West Germany	987	2,049	46,131,107	72,487,510	4,890,880	5,749,509	2,300,671	2,279,488	1,669,557	887,058
Assets zero or not reported	121	194	—	25,697	3,616	4,236	828	768	1,609	459
\$1 under \$1,000,000	496	761	232,607	733,117	-23,700	48,343	15,329	14,442	17,438	11,548
\$1,000,000 under \$10,000,000	456	677	2,547,287	6,272,733	258,900	378,825	142,146	138,825	143,524	84,345
\$10,000,000 under \$100,000,000	254	363	10,543,206	21,601,765	1,325,206	1,518,414	600,907	593,106	485,848	344,580
\$100,000,000 or more	42	54	32,808,007	43,854,198	3,326,858	3,799,934	1,541,461	1,532,346	1,021,137	446,127
All Other Europe	424	1,098	9,509,743	16,050,229	959,001	1,130,706	215,468	218,969	820,544	269,062
Assets zero or not reported	98	169	—	25,858	-929	1,040	-3	-3	73	—
\$1 under \$1,000,000	236	404	108,328	216,422	2,246	16,445	5,874	5,348	3,222	1,117
\$1,000,000 under \$10,000,000	226	374	1,444,897	2,407,993	92,490	171,488	43,367	42,503	30,966	20,325
\$10,000,000 under \$100,000,000	90	139	4,291,336	8,070,336	570,799	620,580	114,677	114,456	157,295	105,329
\$100,000,000 or more	10	12	3,665,182	5,329,619	294,395	321,153	51,552	56,665	628,987	142,293
<b>Africa, total</b>	<b>521</b>	<b>1,668</b>	<b>17,194,842</b>	<b>22,669,414</b>	<b>1,704,355</b>	<b>2,091,626</b>	<b>547,960</b>	<b>548,240</b>	<b>732,986</b>	<b>340,029</b>
Assets zero or not reported	170	275	—	7,426	6,433	8,186	715	715	2,678	978
\$1 under \$1,000,000	267	554	143,119	239,832	-52,170	34,837	6,871	6,700	11,830	7,807
\$1,000,000 under \$10,000,000	251	525	2,115,677	2,622,126	277,980	342,255	99,857	100,109	76,530	45,428
\$10,000,000 under \$100,000,000	140	288	7,001,871	8,417,367	932,761	1,025,427	318,036	317,851	195,154	155,290
\$100,000,000 or more	20	26	7,934,176	11,382,663	539,351	680,920	122,480	122,865	446,792	130,525
Liberia	158	509	8,855,733	8,517,246	156,069	498,350	16,908	17,353	343,407	45,119
Assets zero or not reported	58	73	—	4,762	3,641	4,989	—	—	776	246
\$1 under \$1,000,000	56	130	26,991	80,888	-73,841	6,385	67	49	1,027	281
\$1,000,000 under \$10,000,000	67	171	789,518	417,840	10,658	60,770	-2,849	-2,845	22,067	9,447
\$10,000,000 under \$100,000,000	54	120	3,139,608	2,432,091	198,465	267,490	16,993	17,067	17,265	6,380
\$100,000,000 or more	13	15	4,999,615	5,881,665	17,146	158,715	2,697	3,082	302,272	28,764
South Africa (Including S.W. Africa)	324	674	5,141,003	8,947,163	969,082	975,722	272,077	272,607	238,271	179,653
Assets zero or not reported	62	91	—	2,061	2,309	2,438	715	715	1,880	721
\$1 under \$1,000,000	168	283	76,967	110,048	21,581	22,893	4,899	4,891	9,898	6,928
\$1,000,000 under \$10,000,000	146	196	727,912	1,332,579	182,500	184,318	64,275	64,352	36,036	23,989
\$10,000,000 under \$100,000,000	80	97	2,127,766	3,048,335	427,392	430,773	149,070	149,523	113,545	102,015
\$100,000,000 or more	16	7	2,208,359	4,454,140	335,300	335,300	53,127	53,127	76,911	46,001
OPEC Countries	68	90	1,077,667	1,622,393	220,531	231,023	97,554	96,698	76,740	63,816
Assets zero or not reported	18	21	—	—	—	—	—	—	—	—
\$1 under \$1,000,000	25	25	5,779	9,067	-1,442	448	226	128	—	—
\$1,000,000 under \$10,000,000	21	23	97,308	101,554	10,887	11,437	5,163	5,163	1,096	483
\$10,000,000 under \$100,000,000	15	18	405,810	325,108	75,502	83,553	52,258	51,500	8,035	7,572
\$100,000,000 or more	3	3	568,770	1,186,664	135,585	135,585	39,906	39,906	67,609	55,760
All Other Africa	150	394	2,120,439	3,582,612	358,673	386,531	161,420	161,582	74,568	51,442
Assets zero or not reported	56	90	—	602	483	759	—	—	22	11
\$1 under \$1,000,000	70	116	33,382	39,829	1,533	5,111	1,688	1,632	905	599
\$1,000,000 under \$10,000,000	67	135	500,939	770,152	73,936	85,730	33,268	33,438	17,331	11,510
\$10,000,000 under \$100,000,000	**22	**53	**1,586,118	**2,772,029	**282,721	**294,931	**126,464	**126,512	**56,309	**39,322
\$100,000,000 or more	**	**	**	**	**	**	**	**	**	**
<b>Asia, total</b>	<b>946</b>	<b>2,769</b>	<b>31,485,764</b>	<b>41,008,878</b>	<b>4,017,655</b>	<b>4,318,504</b>	<b>1,356,698</b>	<b>1,332,532</b>	<b>963,064</b>	<b>786,618</b>
Assets zero or not reported	196	318	—	89,495	23,070	25,662	2,254	2,254	5,500	403
\$1 under \$1,000,000	596	1,096	288,129	618,546	10,683	59,601	15,245	771	14,517	7,463
\$1,000,000 under \$10,000,000	485	921	3,445,935	5,330,518	579,882	661,099	170,498	169,064	161,827	111,124
\$10,000,000 under \$100,000,000	201	377	10,744,601	14,199,190	1,573,126	1,684,750	522,763	514,576	396,893	324,634
\$100,000,000 or more	35	58	17,007,099	20,771,128	1,830,893	1,887,392	645,938	645,867	384,326	342,994
Hong Kong	415	665	8,275,576	5,821,380	729,868	756,757	159,581	158,947	242,072	192,170
Assets zero or not reported	74	92	—	21,233	3,695	3,701	444	444	275	266
\$1 under \$1,000,000	221	290	67,699	152,033	8,915	21,862	1,996	1,984	9,248	4,968
\$1,000,000 under \$10,000,000	171	201	708,445	1,162,189	132,372	142,852	17,735	17,252	68,295	39,330
\$10,000,000 under \$100,000,000	52	60	2,084,680	1,868,739	340,468	343,923	105,060	104,921	108,187	93,303
\$100,000,000 or more	16	22	5,414,751	2,617,186	244,417	244,417	34,346	34,346	56,068	54,303
Indonesia	51	63	569,055	530,442	171,133	182,720	40,986	34,878	48,138	39,375
Assets zero or not reported	6	7	—	—	—	—	—	—	—	—
\$1 under \$1,000,000	10	10	3,125	1,617	68	294	77	77	—	—
\$1,000,000 under \$10,000,000	32	32	152,046	163,473	95,796	103,922	9,843	9,843	7,266	6,512
\$10,000,000 under \$100,000,000	11	14	413,884	365,353	75,268	78,504	31,065	24,958	40,872	32,863
\$100,000,000 or more	—	—	—	—	—	—	—	—	—	—

Footnotes at end of table.

## Controlled Foreign Corporations, 1980

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**Table 1.—Number of U.S. Corporation Returns and Number, Total Assets, Receipts, Earnings, Taxes, and Distributions of Controlled Foreign Corporations, by Selected Country of Incorporation and Size of Total Assets of Controlled Foreign Corporation—Continued**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Selected country of incorporation and size of total assets of Controlled Foreign Corporation	Number of U.S. corporation returns	Controlled Foreign Corporations								
		Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign corporations with current earnings and profits (+) before taxes		Foreign income taxes (net)	Distributions	
						Current earnings and profits before taxes	Foreign income taxes (net)		Total	Out of current earnings and profits
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Asia (continued)										
Japan	423	595	10,214,965	16,175,231	1,497,131	1,617,141	709,933	693,713	378,418	334,758
Assets zero or not reported	26	29	—	20,973	— 119	767	797	797	408	—
\$1 under \$1,000,000	202	236	68,278	136,848	— 10,899	13,721	5,410	— 9,122	807	411
\$1,000,000 under \$10,000,000	192	218	827,062	1,461,721	102,979	130,990	59,287	59,091	15,809	11,262
\$10,000,000 under \$100,000,000	81	99	2,797,726	3,531,503	317,629	374,967	168,730	167,238	84,090	69,879
\$100,000,000 or more	13	13	6,521,898	11,024,185	1,087,541	1,096,696	475,710	475,710	277,304	253,207
Middle East (Except OPEC)	130	202	2,391,526	1,716,138	174,812	182,170	54,786	54,240	19,807	14,256
Assets zero or not reported	36	36	—	39,203	18,607	18,884	198	198	4,680	—
\$1 under \$1,000,000	65	83	19,011	34,758	1,448	3,542	1,407	1,440	476	340
\$1,000,000 under \$10,000,000	50	59	221,848	263,545	29,007	32,578	9,266	8,658	5,042	4,887
\$10,000,000 under \$100,000,000	17	19	577,960	390,784	50,187	51,603	11,994	12,022	9,310	8,730
\$100,000,000 or more	3	5	1,572,707	987,847	75,562	75,562	31,921	31,921	299	299
OPEC (Excluding Indonesia)	83	125	624,160	677,944	52,510	67,740	4,460	4,570	19,234	15,050
Assets zero or not reported	21	40	—	2,958	— 4	—	—	—	—	—
\$1 under \$1,000,000	35	40	8,734	10,261	— 991	364	96	99	22	22
\$1,000,000 under \$10,000,000	30	30	111,466	124,423	11,919	15,427	723	830	5,317	4,151
\$10,000,000 under \$100,000,000	13	15	503,960	540,302	41,587	51,949	3,641	3,641	13,895	10,878
\$100,000,000 or more	—	—	—	—	—	—	—	—	—	—
Philippines	156	213	2,194,150	3,357,485	236,412	272,415	106,771	105,402	54,410	45,553
Assets zero or not reported	19	20	—	4,023	— 344	78	94	94	—	—
\$1 under \$1,000,000	69	77	17,948	30,358	2,336	3,070	897	897	761	490
\$1,000,000 under \$10,000,000	68	76	306,165	420,007	29,679	38,545	12,648	12,310	4,301	3,476
\$10,000,000 under \$100,000,000	36	37	994,767	1,744,237	156,270	181,541	66,319	65,359	38,097	35,863
\$100,000,000 or more	3	3	875,269	1,158,860	48,471	49,181	26,813	26,742	11,250	5,724
All Other Asia	409	905	7,216,332	12,730,258	1,155,789	1,239,562	280,181	280,781	200,985	145,455
Assets zero or not reported	72	94	—	1,104	1,235	2,232	720	720	137	137
\$1 under \$1,000,000	251	359	103,333	252,671	9,807	16,747	5,363	5,396	3,203	1,233
\$1,000,000 under \$10,000,000	197	304	1,118,902	1,735,160	178,129	196,785	60,996	61,079	55,798	41,508
\$10,000,000 under \$100,000,000	90	133	3,371,622	5,758,273	591,716	602,264	135,954	136,438	102,442	73,117
\$100,000,000 or more	11	15	2,622,474	4,983,050	374,901	421,535	77,148	77,148	39,405	29,461
Oceania, total	681	1,976	21,874,465	23,104,538	1,737,143	1,997,387	706,528	726,449	414,652	353,892
Assets zero or not reported	159	298	—	26,299	9,977	11,201	1,679	1,691	11,530	8,160
\$1 under \$1,000,000	385	761	192,751	373,599	5,060	32,666	8,569	9,105	11,778	6,224
\$1,000,000 under \$10,000,000	363	608	2,221,994	3,398,573	253,218	292,695	111,232	110,810	53,305	37,085
\$10,000,000 under \$100,000,000	190	273	7,389,715	8,556,213	752,118	801,395	279,312	288,188	164,481	135,148
\$100,000,000 or more	27	36	12,070,005	10,749,944	716,769	859,429	305,736	316,655	173,558	167,274
Australia	647	1,602	20,418,036	20,639,051	1,555,874	1,803,113	642,907	662,657	368,286	312,262
Assets zero or not reported	132	220	—	21,074	9,395	10,611	1,380	1,392	11,223	7,983
\$1 under \$1,000,000	337	611	153,209	297,005	143	25,650	6,073	6,497	10,445	5,616
\$1,000,000 under \$10,000,000	324	495	1,857,970	2,825,020	211,481	246,263	95,802	95,270	49,437	33,664
\$10,000,000 under \$100,000,000	**207	**276	**18,406,857	**17,495,953	**1,334,855	**1,520,588	**539,653	**559,498	**297,182	**264,999
\$100,000,000 or more	**	**	**	**	**	**	**	**	**	**
All Other Oceania	222	374	1,456,428	2,465,486	181,269	194,274	63,620	63,792	46,366	41,630
Assets zero or not reported	50	78	—	5,136	582	590	299	299	307	177
\$1 under \$1,000,000	113	150	39,543	76,594	4,917	7,016	2,496	2,608	1,333	608
\$1,000,000 under \$10,000,000	96	113	364,024	573,553	41,737	46,432	15,431	15,540	3,869	3,422
\$10,000,000 under \$100,000,000	**28	**33	**1,052,862	**1,810,203	**134,033	**140,236	**45,394	**45,345	**40,857	**37,423
\$100,000,000 or more	**	**	**	**	**	**	**	**	**	**
Puerto Rico and U.S. Possessions, total	246	488	3,753,865	6,772,365	228,834	248,150	57,449	56,944	19,708	13,245
Assets zero or not reported	40	52	—	4,523	4,688	5,017	293	293	—	—
\$1 under \$1,000,000	147	221	65,630	111,058	5,310	9,072	1,894	1,938	356	186
\$1,000,000 under \$10,000,000	104	174	597,547	654,462	41,118	52,719	17,021	16,556	5,448	4,076
\$10,000,000 under \$100,000,000	32	37	1,007,185	1,049,510	69,501	73,325	21,755	21,671	8,604	7,609
\$100,000,000 or more	4	4	2,083,503	4,952,812	108,017	108,017	16,486	16,486	5,300	1,375
OPEC Countries, total (included above)	339	859	7,131,635	9,018,260	880,128	1,048,218	301,365	296,734	276,964	227,209
Assets zero or not reported	89	138	—	3,495	558	651	15	11	1,773	636
\$1 under \$1,000,000	178	260	68,885	93,320	769	8,996	1,439	1,385	2,052	473
\$1,000,000 under \$10,000,000	168	300	1,222,669	1,419,660	222,925	249,435	46,810	46,870	39,402	32,538
\$10,000,000 under \$100,000,000	100	151	3,903,463	4,381,490	529,845	578,899	197,017	191,019	158,388	134,041
\$100,000,000 or more	10	10	1,936,618	3,120,295	126,031	210,237	56,083	57,449	75,349	59,521

\*\*Deleted or combined to avoid disclosure of information for specific corporations.

Note: Detail may not add to total because of rounding.

## Controlled Foreign Corporations, 1980

Table 2.—Number of U.S. Corporation Returns and Number, Total Assets, Receipts, Earnings, Taxes, and Distributions of Controlled Foreign Corporations, by Selected Country of Incorporation and Taxes as a Percentage of Earnings and Profits of Controlled Foreign Corporation

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Selected country of incorporation and taxes (+) as a percent of current earnings and profits (+) before taxes	Number of U.S. corporation returns	Controlled Foreign Corporations								
		Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign corporations with current earnings and profits (+) before taxes		Foreign income taxes (net)	Distributions	
						Current earnings and profits before taxes	Foreign income taxes (net)		Total	Out of current earnings and profits
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
All Geographic Areas, total										
All foreign corporations	4,799	35,471	508,031,994	699,003,002	47,621,582	55,794,508	16,736,730	16,440,451	14,115,642	9,643,638
Foreign corporations with current earnings and profits (+) before taxes:										
Total	3,250	19,523	420,912,123	596,690,896	55,794,508	55,794,508	16,736,730	16,736,730	13,198,764	9,638,623
With taxes (+) as a percent of current earnings and profits (+) before taxes:										
Total	2,359	14,135	354,292,586	503,092,043	50,489,476	50,489,476	16,886,509	16,886,509	12,042,811	9,007,987
Under 10 percent	622	1,333	54,585,898	67,579,594	7,392,907	7,392,907	268,476	268,476	2,358,263	1,789,116
10 under 20 percent	607	1,219	41,155,804	53,824,757	4,995,452	4,995,452	740,799	740,799	1,013,168	765,425
20 under 30 percent	719	1,715	49,399,799	79,034,049	7,307,291	7,307,291	1,871,766	1,871,766	1,551,033	1,239,905
30 under 40 percent	936	2,431	69,707,716	105,334,137	10,613,238	10,613,238	3,698,994	3,698,994	2,640,893	1,816,914
40 under 45 percent	769	1,734	38,817,217	47,881,252	6,866,663	6,866,663	2,900,701	2,900,701	1,288,100	1,087,436
45 under 50 percent	874	2,100	35,785,161	51,953,853	5,384,577	5,384,577	2,540,111	2,540,111	1,263,406	1,039,485
50 under 60 percent	821	2,018	34,877,168	52,849,088	4,989,939	4,989,939	2,677,469	2,677,469	1,250,890	848,404
60 under 80 percent	496	870	17,077,798	25,882,376	2,049,640	2,049,640	1,341,126	1,341,126	455,239	334,747
80 under 100 percent	232	306	6,414,831	10,582,940	762,078	762,078	658,619	658,619	165,623	86,557
100 percent or more	270	408	6,471,193	8,169,996	127,692	127,692	188,448	188,448	56,195	—
With no foreign income taxes	1,830	4,879	56,396,490	80,865,905	4,515,883	4,515,883	—	—	991,362	536,488
With foreign income taxes (-)	325	510	10,223,047	12,732,949	789,149	789,149	-149,779	-149,779	164,591	94,147
Foreign corporations with current earnings and profits deficit before taxes	2,265	7,853	83,768,172	101,800,595	-8,172,926	—	—	-296,648	897,193	5,015
Foreign corporations with no current earnings and profits (+) and (-) before taxes	1,980	8,095	3,351,699	511,511	—	—	—	369	19,685	—
Canada										
All foreign corporations	2,527	5,415	90,043,610	100,773,346	8,285,453	8,963,459	3,251,184	3,142,670	1,987,908	1,558,742
Foreign corporations with current earnings and profits (+) before taxes:										
Total	1,709	3,071	75,643,254	79,494,473	8,963,459	8,963,459	3,251,184	3,251,184	1,959,731	1,558,742
With taxes (+) as a percent of current earnings and profits (+) before taxes:										
Total	1,366	2,403	66,682,705	73,990,124	8,387,840	8,387,840	3,285,749	3,285,749	1,884,723	1,525,185
Under 10 percent	99	107	3,079,281	2,730,420	345,660	345,660	14,613	14,613	131,362	87,010
10 under 20 percent	94	115	6,503,478	4,710,166	736,649	736,649	114,967	114,967	256,588	212,923
20 under 30 percent	153	193	7,936,356	9,255,485	984,424	984,424	258,125	258,125	240,501	215,090
30 under 40 percent	337	407	12,897,322	14,750,945	1,917,034	1,917,034	674,286	674,286	293,595	260,476
40 under 45 percent	342	419	12,181,890	14,685,919	1,550,679	1,550,679	661,717	661,717	336,212	281,720
45 under 50 percent	404	497	7,876,831	11,522,739	1,064,415	1,064,415	504,323	504,323	161,174	135,361
50 under 60 percent	373	499	8,606,150	7,782,211	939,502	939,502	507,516	507,516	251,229	156,391
60 under 80 percent	81	105	6,632,572	7,934,720	833,862	833,862	534,389	534,389	211,140	175,970
80 under 100 percent	24	25	578,563	455,465	12,261	12,261	11,010	11,010	2,858	242
100 percent or more	32	37	390,162	162,055	3,353	3,353	4,803	4,803	63	—
With no foreign income taxes	466	613	7,999,969	4,832,199	384,557	384,557	—	—	37,823	25,679
With foreign income taxes (-)	49	55	960,580	672,150	191,062	191,062	-34,564	-34,564	37,185	7,878
Foreign corporations with current earnings and profits deficit before taxes	659	894	13,794,102	21,038,815	-678,005	—	—	-108,504	27,985	—
Foreign corporations with no current earnings and profits (+) and (-) before taxes	802	1,450	606,255	240,058	—	—	—	-10	192	—
Latin America, total										
All foreign corporations	1,504	5,910	63,574,969	81,021,279	4,935,978	7,218,439	1,883,281	1,899,571	1,427,837	1,102,064
Foreign corporations with current earnings and profits (+) before taxes:										
Total	900	3,015	49,783,522	70,415,862	7,218,439	7,218,439	1,883,281	1,883,281	1,399,357	1,102,064
With taxes (+) as a percent of current earnings and profits (+) before taxes:										
Total	626	2,134	41,652,018	65,131,854	6,634,814	6,634,814	1,890,193	1,890,193	1,298,760	1,021,793
Under 10 percent	152	229	10,717,176	17,090,470	1,359,743	1,359,743	28,202	28,202	300,417	253,644
10 under 20 percent	148	246	4,297,494	4,696,977	691,855	691,855	100,652	100,652	145,554	94,123
20 under 30 percent	216	370	6,746,055	11,722,682	1,289,394	1,289,394	311,938	311,938	290,319	224,308
30 under 40 percent	224	384	6,699,303	9,631,427	1,121,741	1,121,741	392,715	392,715	205,040	158,760
40 under 45 percent	167	225	3,979,076	6,270,600	820,546	820,546	351,141	351,141	128,054	117,110
45 under 50 percent	220	301	3,696,105	7,177,226	854,031	854,031	403,686	403,686	133,799	110,957
50 under 60 percent	168	200	2,343,001	5,253,300	378,539	378,539	199,822	199,822	59,416	50,911
60 under 80 percent	70	80	562,067	736,009	62,297	62,297	42,273	42,273	12,474	9,574
80 under 100 percent	41	45	696,065	2,016,774	46,380	46,380	40,504	40,504	10,751	2,406
100 percent or more	49	54	1,915,676	536,388	10,288	10,288	19,261	19,261	12,936	—
With no foreign income taxes	508	830	7,463,983	4,507,129	538,445	538,445	—	—	93,407	73,404
With foreign income taxes (-)	41	51	667,521	776,879	45,180	45,180	-6,912	-6,912	7,190	6,868
Foreign corporations with current earnings and profits deficit before taxes	702	1,409	13,199,134	10,577,241	-2,282,462	—	—	15,980	28,031	—
Foreign corporations with no current earnings and profits (+) and (-) before taxes	698	1,486	592,313	28,176	—	—	—	310	450	—

Footnotes at end of table.

## Controlled Foreign Corporations, 1980

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**Table 2.—Number of U.S. Corporation Returns and Number, Total Assets, Receipts, Earnings, Taxes, and Distributions of Controlled Foreign Corporations, by Selected Country of Incorporation and Taxes as a Percentage of Earnings and Profits of Controlled Foreign Corporation—Continued**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Selected country of incorporation and taxes (+) as a percent of current earnings and profits (+) before taxes	Number of U.S. corporation returns	Controlled Foreign Corporations								Distributions	
		Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign corporations with current earnings and profits (+) before taxes		Foreign income taxes (net)			
						Current earnings and profits before taxes	Foreign income taxes (net)		Total	Out of current earnings and profits	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	
<b>Latin America (continued)</b>											
<b>Brazil</b>											
All foreign corporations	687	1,330	18,714,994	25,617,128	1,183,736	1,566,973	479,521	492,684	319,325	233,104	
Foreign corporations with current earnings and profits (+) before taxes:											
Total	348	591	14,191,794	20,332,813	1,566,973	1,566,973	479,521	479,521	313,995	233,104	
With taxes (+) as a percent of current earnings and profits (+) before taxes:											
Total	269	427	13,012,713	19,039,452	1,483,069	1,483,069	481,191	481,191	303,194	223,436	
Under 10 percent	43	58	2,321,205	2,077,123	182,515	182,515	7,140	7,140	28,174	26,372	
10 under 20 percent	40	49	1,078,204	1,127,584	117,332	117,332	17,208	17,208	8,528	8,341	
20 under 30 percent	65	70	1,942,858	5,052,689	351,042	351,042	92,057	92,057	114,807	76,698	
30 under 40 percent	76	93	3,094,305	4,403,768	392,674	392,674	137,116	137,116	62,755	48,349	
40 under 45 percent	40	43	1,147,365	1,580,107	163,226	163,226	70,662	70,662	12,861	12,235	
45 under 50 percent	24	25	1,146,252	3,420,127	173,072	173,072	83,494	83,494	35,705	31,225	
50 under 60 percent	37	37	425,453	527,840	49,916	49,916	27,467	27,467	18,007	13,320	
60 under 80 percent	20	20	259,689	352,763	36,627	36,627	24,755	24,755	7,993	6,586	
80 under 100 percent	9	9	147,006	222,303	9,153	9,153	8,098	8,098	3,278	309	
100 percent or more	23	24	1,450,377	275,171	7,513	7,513	13,194	13,194	11,085	—	
With no foreign income taxes	121	151	940,263	993,895	74,466	74,466	—	—	8,036	7,226	
With foreign income taxes (-)	11	13	238,818	299,467	9,438	9,438	-1,670	-1,670	2,765	2,443	
Foreign corporations with current earnings and profits deficit before taxes	356	491	4,283,618	5,267,467	-383,237	—	—	13,162	5,330	—	
Foreign corporations with no current earnings and profits (+) and (-) before taxes	171	247	239,581	16,848	—	—	—	—	—	—	
<b>Mexico</b>											
All foreign corporations	632	1,249	8,520,743	11,883,394	1,638,105	1,692,600	709,214	705,451	241,003	188,643	
Foreign corporations with current earnings and profits (+) before taxes:											
Total	468	769	7,939,737	11,529,525	1,692,600	1,692,600	709,214	709,214	240,475	188,643	
With taxes (+) as a percent of current earnings and profits (+) before taxes:											
Total	402	661	7,695,633	11,260,442	1,660,256	1,660,256	709,964	709,964	238,275	186,443	
Under 10 percent	27	32	189,516	123,446	26,012	26,012	838	838	13,403	13,085	
10 under 20 percent	19	21	92,966	81,544	13,918	13,918	1,857	1,857	344	320	
20 under 30 percent	50	54	415,294	472,191	86,363	86,363	22,592	22,592	23,417	13,479	
30 under 40 percent	73	84	1,659,228	2,704,776	330,109	330,109	116,437	116,437	46,143	32,000	
40 under 45 percent	89	100	1,558,261	2,177,159	407,545	407,545	174,008	174,008	67,049	61,642	
45 under 50 percent	163	202	1,988,565	2,887,360	572,479	572,479	268,822	268,822	73,458	55,773	
50 under 60 percent	95	106	1,230,612	2,071,350	192,650	192,650	100,576	100,576	8,794	7,472	
60 under 80 percent	31	34	149,638	138,783	12,052	12,052	8,600	8,600	1,680	914	
80 under 100 percent	18	18	387,068	567,874	18,871	18,871	15,719	15,719	3,987	1,757	
100 percent or more	9	9	24,484	35,960	257	257	515	515	—	—	
With no foreign income taxes	94	103	182,368	217,379	30,091	30,091	—	—	2,027	2,027	
With foreign income taxes (-)	5	5	61,736	51,703	2,253	2,253	-750	-750	173	173	
Foreign corporations with current earnings and profits deficit before taxes	160	210	544,460	350,267	-54,495	—	—	-3,762	308	—	
Foreign corporations with no current earnings and profits (+) and (-) before taxes	188	270	36,547	3,602	—	—	—	—	219	—	
<b>Panama (Including Canal Zone)</b>											
All foreign corporations	422	921	13,952,464	19,657,203	1,427,229	1,502,321	132,790	136,160	347,957	251,745	
Foreign corporations with current earnings and profits (+) before taxes:											
Total	233	371	11,653,023	18,154,632	1,502,321	1,502,321	132,790	132,790	338,003	251,745	
With taxes (+) as a percent of current earnings and profits (+) before taxes:											
Total	117	179	9,534,534	17,297,515	1,351,029	1,351,029	132,885	132,885	305,989	232,005	
Under 10 percent	39	43	6,510,492	12,592,650	880,349	880,349	9,555	9,555	150,964	145,492	
10 under 20 percent	29	33	1,088,049	858,250	169,910	169,910	21,844	21,844	62,577	14,532	
20 under 30 percent	32	38	1,287,461	635,113	166,835	166,835	39,899	39,899	54,436	44,326	
30 under 40 percent	19	23	176,846	438,898	60,222	60,222	19,321	19,321	21,535	15,753	
40 under 45 percent	8	8	69,385	65,515	9,901	9,901	4,216	4,216	100	100	
45 under 50 percent	9	10	31,368	79,251	14,404	14,404	6,716	6,716	4,000	3,971	
50 under 60 percent	9	9	177,252	2,011,423	33,193	33,193	18,048	18,048	7,600	6,214	
60 under 80 percent	8	8	87,758	140,009	6,224	6,224	4,167	4,167	1,560	1,354	
80 under 100 percent	**7	**7	**105,923	**476,406	**9,991	**9,991	**9,119	**9,119	**3,217	**263	
100 percent or more	**	**	**	**	**	**	**	**	**	**	
With no foreign income taxes	142	187	2,049,188	809,717	145,093	145,093	—	—	31,677	19,403	
With foreign income taxes (-)	4	5	69,302	47,400	6,199	6,199	-96	-96	337	337	
Foreign corporations with current earnings and profits deficit before taxes	97	164	2,193,568	1,497,570	-75,092	—	—	3,370	9,724	—	
Foreign corporations with no current earnings and profits (+) and (-) before taxes	222	386	105,873	5,001	—	—	—	—	231	—	

Footnotes at end of table.

## Controlled Foreign Corporations, 1980

Table 2.—Number of U.S. Corporation Returns and Number, Total Assets, Receipts, Earnings, Taxes, and Distributions of Controlled Foreign Corporations, by Selected Country of Incorporation and Taxes as a Percentage of Earnings and Profits of Controlled Foreign Corporation—Continued

[All figures are estimates based on samples—money amounts are in thousands of dollars]

All figures are estimates based on samples. Money amounts are in millions of dollars.										
Selected country of incorporation and taxes (+) as a percent of current earnings and profits (+) before taxes	Number of U.S. corporation returns	Controlled Foreign Corporations								
		Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign corporations with current earnings and profits (+) before taxes		Foreign income taxes (net)	Distributions	
						Current earnings and profits before taxes	Foreign income taxes (net)		Total	Out of current earnings and profits
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
<b>Latin America (continued)</b>										
<b>Venezuela</b>										
All foreign corporations .....	248	494	4,588,308	5,850,745	411,523	538,498	153,759	155,972	127,562	103,979
Foreign corporations with current earnings and profits (+) before taxes:										
Total .....	158	298	3,760,397	4,671,076	538,498	538,498	153,759	153,759	123,071	103,979
With taxes (+) as a percent of current earnings and profits (+) before taxes:										
Total .....	128	238	3,090,979	4,051,039	510,666	510,666	154,257	154,257	120,796	103,020
Under 10 percent .....	21	25	748,237	690,943	83,992	83,992	2,805	2,805	26,286	24,492
10 under 20 percent .....	26	43	259,434	291,641	41,847	41,847	6,356	6,356	7,719	6,922
20 under 30 percent .....	46	72	502,134	642,359	71,632	71,632	18,695	18,695	10,349	8,131
30 under 40 percent .....	51	66	630,073	944,001	150,980	150,980	53,269	53,269	43,241	32,461
40 under 45 percent .....	18	20	622,717	1,090,198	94,271	94,271	39,384	39,384	14,171	11,985
45 under 50 percent .....	6	6	56,771	78,499	18,967	18,967	9,022	9,022	6,034	6,034
50 under 60 percent .....	**6	**6	**271,613	**313,398	**48,977	**48,977	**24,726	**24,726	**12,995	**12,995
60 under 80 percent .....	..	..	..	..	..	..	..	..	..	..
80 under 100 percent .....	..	..	..	..	..	..	..	..	..	..
100 percent or more .....	..	..	..	..	..	..	..	..	..	..
With no foreign income taxes .....	47	53	579,204	539,687	21,952	21,952	—	—	1,877	562
With foreign income taxes (-) .....	5	7	90,214	80,350	5,880	5,880	-498	-498	397	397
Foreign corporations with current earnings and profits deficit before taxes .....	62	76	815,643	1,179,669	-126,975	—	—	2,213	4,491	—
Foreign corporations with no current earnings and profits (+) and (-) before taxes .....	98	120	12,267	—	—	—	—	—	—	—
<b>Other Western Hemisphere, total</b>										
All foreign corporations .....	740	1,462	38,275,340	59,033,035	2,257,408	2,507,347	186,255	184,951	943,353	379,426
Foreign corporations with current earnings and profits (+) before taxes:										
Total .....	540	895	35,012,580	53,138,563	2,507,347	2,507,347	186,255	186,255	809,015	379,426
With taxes (+) as a percent of current earnings and profits (+) before taxes:										
Total .....	225	298	22,115,628	17,506,732	1,258,365	1,258,365	188,941	188,941	567,713	216,212
Under 10 percent .....	104	117	8,304,553	5,106,607	698,235	698,235	19,521	19,521	315,508	141,772
10 under 20 percent .....	35	37	3,518,904	707,711	211,037	211,037	25,513	25,513	38,449	11,103
20 under 30 percent .....	55	61	2,557,569	431,139	95,463	95,463	25,472	25,472	37,886	13,697
30 under 40 percent .....	28	30	2,417,312	8,042,718	116,743	116,743	40,024	40,024	140,857	40,303
40 under 45 percent .....	7	7	2,372,908	558,210	67,809	67,809	29,877	29,877	5,242	2,999
45 under 50 percent .....	17	17	792,577	2,243,465	21,043	21,043	9,736	9,736	953	277
50 under 60 percent .....	14	14	82,006	213,278	10,959	10,959	6,011	6,011	1,310	762
60 under 80 percent .....	5	5	186,218	48,678	23,224	23,224	15,730	15,730	21,583	4,922
80 under 100 percent .....	5	5	1,173,616	141,368	13,326	13,326	12,050	12,050	5,300	378
100 percent or more .....	5	5	709,966	13,557	525	525	5,006	5,006	624	—
With no foreign income taxes .....	411	585	12,675,634	35,528,394	1,212,990	1,212,990	—	—	199,709	138,450
With foreign income taxes (-) .....	10	11	221,318	103,438	35,993	35,993	-2,686	-2,686	41,593	24,764
Foreign corporations with current earnings and profits deficit before taxes .....	223	308	2,644,174	5,870,506	-249,940	—	—	-1,305	130,461	—
Foreign corporations with no current earnings and profits (+) and (-) before taxes .....	191	260	618,586	23,966	—	—	—	—	3,877	—

Footnotes at end of table.



**Table 2.—Number of U.S. Corporation Returns and Number, Total Assets, Receipts, Earnings, Taxes, and Distributions of Controlled Foreign Corporations, by Selected Country of Incorporation and Taxes as a Percentage of Earnings and Profits of Controlled Foreign Corporation—Continued**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Selected country of incorporation and taxes (+) as a percent of current earnings and profits (+) before taxes	Number of U.S. corporation returns	Controlled Foreign Corporations								Distributions	
		Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign corporations with current earnings and profits (+) before taxes		Foreign income taxes (net)	Total		Out of current earnings and profits
						Current earnings and profits before taxes	Foreign income taxes (net)				
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	
<b>Other Western Hemisphere (continued)</b>											
<b>The Bahamas</b>											
All foreign corporations .....	146	260	7,524,769	34,951,662	322,780	395,921	43,968	43,511	159,694	75,924	
Foreign corporations with current earnings and profits (+) before taxes:											
Total .....	93	134	7,059,362	33,166,411	395,921	395,921	43,968	43,968	102,723	75,924	
With taxes (+) as a percent of current earnings and profits (+) before taxes:											
Total .....	29	34	1,797,290	8,820,598	180,974	180,974	45,220	45,220	55,726	44,067	
Under 10 percent .....	6	6	200,176	277,573	41,462	41,462	1,471	1,471	6,264	3,577	
10 under 20 percent .....	**7	**7	**513,317	**118,856	**38,029	**38,029	**5,788	**5,788	**3,828	**2,830	
20 under 30 percent .....	**	**	**	**	**	**	**	**	**	**	
30 under 40 percent .....	**11	**11	**824,946	**8,168,734	**91,304	**91,304	**32,449	**32,449	**44,433	**37,135	
40 under 45 percent .....	**	**	**	**	**	**	**	**	**	**	
45 under 50 percent .....	4	4	216,162	52,091	3,010	3,010	1,404	1,404	701	25	
50 under 60 percent .....	**6	**6	**42,689	**203,344	**7,169	**7,169	**4,108	**4,108	**500	**500	
60 under 80 percent .....	**	**	**	**	**	**	**	**	**	**	
80 under 100 percent .....	**	**	**	**	**	**	**	**	**	**	
100 percent or more .....	**	**	**	**	**	**	**	**	**	**	
With no foreign income taxes .....	71	97	5,192,643	24,276,810	200,598	200,598	—	—	29,579	19,690	
With foreign income taxes (—) .....	3	3	69,429	69,003	14,350	14,350	—1,252	—1,252	17,418	12,168	
Foreign corporations with current earnings and profits deficit before taxes .....	36	53	423,139	1,776,365	—73,141	—	—	—457	56,959	—	
Foreign corporations with no current earnings and profits (+) and (—) before taxes .....	56	74	42,268	8,886	—	—	—	—	12	—	
<b>Bermuda</b>											
All foreign corporations .....	498	821	14,131,863	21,525,395	1,427,284	1,566,404	52,037	51,859	372,378	191,796	
Foreign corporations with current earnings and profits (+) before taxes:											
Total .....	367	528	12,168,998	17,581,384	1,566,404	1,566,404	52,037	52,037	298,888	191,796	
With taxes (+) as a percent of current earnings and profits (+) before taxes:											
Total .....	75	90	5,276,278	6,476,585	559,189	559,189	53,363	53,363	108,984	64,634	
Under 10 percent .....	42	44	3,058,924	3,479,143	368,653	368,653	6,897	6,897	75,508	50,208	
10 under 20 percent .....	8	10	1,202,464	475,953	113,424	113,424	13,706	13,706	3,922	3,663	
20 under 30 percent .....	8	8	279,209	174,726	24,041	24,041	6,173	6,173	10,361	7,649	
30 under 40 percent .....	6	6	294,412	31,476	13,341	13,341	4,881	4,881	6,725	1,299	
40 under 45 percent .....	3	3	47,820	61,723	11,136	11,136	4,936	4,936	999	999	
45 under 50 percent .....	4	4	303,648	2,176,842	11,621	11,621	5,335	5,335	75	74	
50 under 60 percent .....	8	8	37,614	17,601	3,775	3,775	1,973	1,973	810	262	
60 under 80 percent .....	3	3	35,418	46,572	8,830	8,830	5,840	5,840	10,584	480	
80 under 100 percent .....	**4	**4	**16,769	**12,549	**4,368	**4,368	**3,622	**3,622	**	**	
100 percent or more .....	**	**	**	**	**	**	**	**	**	**	
With no foreign income taxes .....	331	433	6,828,249	11,073,206	985,902	985,902	—	—	165,729	114,566	
With foreign income taxes (—) .....	4	5	64,471	31,593	21,314	21,314	—1,326	—1,326	24,175	12,596	
Foreign corporations with current earnings and profits deficit before taxes .....	149	193	1,495,009	3,928,932	—139,120	—	—	—177	73,490	—	
Foreign corporations with no current earnings and profits (+) and (—) before taxes .....	83	100	467,857	15,080	—	—	—	—	—	—	
<b>Netherlands Antilles</b>											
All foreign corporations .....	260	345	14,311,863	2,190,820	450,512	487,332	68,374	67,704	405,521	111,706	
Foreign corporations with current earnings and profits (+) before taxes:											
Total .....	176	215	13,581,876	2,028,424	487,332	487,332	68,374	68,374	401,645	111,706	
With taxes (+) as a percent of current earnings and profits (+) before taxes:											
Total .....	142	170	12,912,862	1,971,687	464,600	464,600	68,481	68,481	397,243	107,511	
Under 10 percent .....	59	66	5,045,071	1,347,843	287,853	287,853	11,152	11,152	233,735	87,988	
10 under 20 percent .....	22	22	1,849,952	169,099	67,338	67,338	8,188	8,188	30,727	4,638	
20 under 30 percent .....	44	49	2,213,631	167,643	52,680	52,680	14,035	14,035	21,737	6,020	
30 under 40 percent .....	**15	**16	**1,512,128	**135,754	**26,424	**26,424	**8,855	**8,855	**93,942	**3,868	
40 under 45 percent .....	**	**	**	**	**	**	**	**	**	**	
45 under 50 percent .....	**14	**14	**1,589,663	**145,863	**29,789	**29,789	**21,374	**21,374	**16,478	**4,997	
50 under 60 percent .....	**	**	**	**	**	**	**	**	**	**	
60 under 80 percent .....	**	**	**	**	**	**	**	**	**	**	
80 under 100 percent .....	**	**	**	**	**	**	**	**	**	**	
100 percent or more .....	3	3	702,417	5,485	516	516	4,877	4,877	624	—	
With no foreign income taxes .....	37	42	581,595	53,895	22,403	22,403	—	—	4,402	4,195	
With foreign income taxes (—) .....	3	3	87,418	2,842	329	329	—108	—108	—	—	
Foreign corporations with current earnings and profits deficit before taxes .....	54	56	717,978	162,396	—36,819	—	—	—670	12	—	
Foreign corporations with no current earnings and profits (+) and (—) before taxes .....	64	74	12,009	—	—	—	—	—	3,865	—	

Footnotes at end of table.

## Controlled Foreign Corporations, 1980

Table 2.—Number of U.S. Corporation Returns and Number, Total Assets, Receipts, Earnings, Taxes, and Distributions of Controlled Foreign Corporations, by Selected Country of Incorporation and Taxes as a Percentage of Earnings and Profits of Controlled Foreign Corporation—Continued

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Selected country of incorporation and taxes (+) as a percent of current earnings and profits (+) before taxes	Number of U.S. corporation returns	Controlled Foreign Corporations							Distributions	
		Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign corporations with current earnings and profits (+) before taxes		Foreign income taxes (net)	Total	Out of current earnings and profits
						Current earnings and profits before taxes	Foreign income taxes (net)			
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
<b>Europe, total</b>										
All foreign corporations	2,347	15,757	241,807,390	364,600,765	24,451,202	28,445,004	8,747,070	8,549,258	7,625,785	5,109,621
Foreign corporations with current earnings and profits (+) before taxes:										
Total	1,698	8,491	197,213,215	310,152,292	28,445,004	28,445,004	8,747,070	8,747,070	6,935,948	5,105,086
With taxes (+) as a percent of current earnings and profits (+) before taxes:										
Total	1,307	6,320	171,668,857	275,109,102	26,534,055	26,534,055	8,841,236	8,841,236	6,654,035	4,891,250
Under 10 percent	354	622	26,663,315	38,513,257	4,234,088	4,234,088	179,828	179,828	1,464,713	1,206,653
10 under 20 percent	309	500	18,761,311	32,916,877	2,413,281	2,413,281	364,071	364,071	432,061	353,880
20 under 30 percent	395	707	27,500,142	51,052,780	4,227,915	4,227,915	1,095,409	1,095,409	850,102	671,051
30 under 40 percent	514	995	36,107,445	53,443,162	5,336,034	5,336,034	1,870,741	1,870,741	1,559,555	981,081
40 under 45 percent	355	598	13,318,993	18,216,343	3,432,369	3,432,369	1,437,327	1,437,327	598,256	492,232
45 under 50 percent	451	846	17,378,096	22,598,166	2,387,430	2,387,430	1,123,446	1,123,446	642,697	488,271
50 under 60 percent	479	1,067	18,827,591	29,967,253	2,940,171	2,940,171	1,560,953	1,560,953	790,154	521,118
60 under 80 percent	364	541	8,368,121	15,534,009	862,073	862,073	568,769	568,769	154,802	94,604
80 under 100 percent	160	193	3,021,479	6,489,977	639,848	639,848	548,917	548,917	123,152	82,359
100 percent or more	180	249	1,722,364	3,777,278	60,846	60,846	91,774	91,774	38,543	—
With no foreign income taxes	826	1,858	18,631,351	25,267,629	1,518,524	1,518,524	—	—	222,926	165,702
With foreign income taxes (-)	226	313	6,913,007	9,775,561	392,426	392,426	-94,166	-94,166	58,988	48,134
Foreign corporations with current earnings and profits deficit before taxes	1,284	3,883	43,589,925	54,273,849	-3,993,803	—	—	-197,869	682,522	4,535
Foreign corporations with no current earnings and profits (+) and (-) before taxes	852	3,383	1,004,250	174,623	—	—	—	57	7,315	—
<b>Austria</b>										
All foreign corporations	210	291	2,488,082	3,847,721	157,297	210,283	76,543	75,233	68,836	56,074
Foreign corporations with current earnings and profits (+) before taxes:										
Total	138	173	2,204,048	3,551,166	210,283	210,283	76,543	76,543	68,756	56,074
With taxes (+) as a percent of current earnings and profits (+) before taxes:										
Total	113	135	1,858,990	3,278,764	203,625	203,625	77,224	77,224	66,878	54,323
Under 10 percent	10	11	87,437	128,263	6,517	6,517	104	104	—	—
10 under 20 percent	6	6	416,342	1,153,466	51,350	51,350	6,440	6,440	26,628	24,717
20 under 30 percent	11	11	175,098	362,069	22,042	22,042	4,751	4,751	1,445	488
30 under 40 percent	13	14	380,833	299,626	29,945	29,945	10,601	10,601	3,772	3,609
40 under 45 percent	10	12	258,408	76,270	5,667	5,667	2,385	2,385	898	792
45 under 50 percent	14	14	90,879	207,033	27,794	27,794	13,070	13,070	10,255	10,058
50 under 60 percent	21	21	60,815	119,218	14,376	14,376	7,911	7,911	5,015	4,148
60 under 80 percent	23	23	238,197	367,008	40,679	40,679	27,285	27,285	11,424	9,919
80 under 100 percent	9	10	139,602	531,728	4,693	4,693	3,999	3,999	7,401	593
100 percent or more	13	13	11,380	34,082	563	563	679	679	39	—
With no foreign income taxes	30	34	304,623	223,525	5,145	5,145	—	—	309	181
With foreign income taxes (-)	4	4	40,434	48,877	1,513	1,513	-681	-681	1,569	1,569
Foreign corporations with current earnings and profits deficit before taxes	78	85	283,073	295,481	-52,986	—	—	-1,317	79	—
Foreign corporations with no current earnings and profits (+) and (-) before taxes	26	33	961	1,074	—	—	—	6	—	—
<b>Belgium</b>										
All foreign corporations	540	835	14,316,653	22,313,903	1,323,109	1,504,889	621,287	619,190	350,551	251,489
Foreign corporations with current earnings and profits (+) before taxes:										
Total	343	492	12,258,515	18,884,234	1,504,889	1,504,889	621,287	621,287	347,066	251,489
With taxes (+) as a percent of current earnings and profits (+) before taxes:										
Total	296	420	11,755,935	17,962,787	1,446,893	1,446,893	621,750	621,750	345,865	250,393
Under 10 percent	29	31	398,318	612,902	42,773	42,773	708	708	5,257	1,302
10 under 20 percent	18	19	2,366,538	534,940	24,482	24,482	3,649	3,649	6,881	6,741
20 under 30 percent	32	35	1,097,322	2,387,245	67,695	67,695	16,256	16,256	47,195	19,660
30 under 40 percent	59	63	2,978,711	5,930,425	486,916	486,916	172,733	172,733	114,544	107,831
40 under 45 percent	25	28	191,145	357,207	32,946	32,946	13,932	13,932	6,090	5,007
45 under 50 percent	55	65	1,513,532	2,935,026	230,820	230,820	106,830	106,830	48,035	40,147
50 under 60 percent	79	97	1,545,809	3,849,293	502,022	502,022	259,995	259,995	93,586	64,694
60 under 80 percent	39	40	1,107,162	482,551	37,791	37,791	24,403	24,403	6,231	4,775
80 under 100 percent	15	16	215,826	320,789	9,516	9,516	8,573	8,573	8,581	235
100 percent or more	26	26	341,572	552,410	12,132	12,132	14,669	14,669	9,464	—
With no foreign income taxes	58	60	442,500	871,533	53,457	53,457	—	—	188	188
With foreign income taxes (-)	11	12	60,080	49,914	4,539	4,539	-462	-462	1,013	908
Foreign corporations with current earnings and profits deficit before taxes	214	250	2,028,680	3,424,817	-181,779	—	—	-2,098	3,485	—
Foreign corporations with no current earnings and profits (+) and (-) before taxes	82	93	29,459	4,852	—	—	—	—	—	—

Footnotes at end of table.

**Table 2.—Number of U.S. Corporation Returns and Number, Total Assets, Receipts, Earnings, Taxes, and Distributions of Controlled Foreign Corporations, by Selected Country of Incorporation and Taxes as a Percentage of Earnings and Profits of Controlled Foreign Corporation—Continued**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Selected country of incorporation and taxes (+) as a percent of current earnings and profits (+) before taxes	Number of U.S. corporation returns	Controlled Foreign Corporations								
		Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign corporations with current earnings and profits (+) before taxes		Foreign income taxes (net)	Distributions	
						Current earnings and profits before taxes	Foreign income taxes (net)		Total	Out of current earnings and profits
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Europe (continued)										
Denmark										
All foreign corporations	170	261	1,985,507	4,370,427	114,678	167,398	58,680	55,745	56,601	42,625
Foreign corporations with current earnings and profits (+) before taxes:										
Total	99	135	1,616,173	3,746,139	167,398	167,398	58,680	58,680	53,796	42,625
With taxes (+) as a percent of current earnings and profits (+) before taxes:										
Total	85	115	1,176,610	2,591,411	150,952	150,952	58,814	58,814	53,796	42,625
Under 10 percent	**	**	**	**	**	**	**	**	**	**
10 under 20 percent	**7	**18	**51,469	**192,665	**5,536	**5,536	**742	**742	**	**
20 under 30 percent	13	13	124,850	198,692	17,155	17,155	4,317	4,317	5,673	3,361
30 under 40 percent	26	30	575,848	1,615,655	43,769	43,769	15,032	15,032	15,488	10,775
40 under 45 percent	20	20	274,757	331,793	73,755	73,755	32,674	32,674	27,537	26,274
45 under 50 percent	8	8	31,877	90,275	3,274	3,274	1,540	1,540	2,626	982
50 under 60 percent	13	13	38,189	68,116	6,040	6,040	3,255	3,255	1,238	1,167
60 under 80 percent	**10	**10	**22,920	**21,735	**1,089	**1,089	**786	**786	**338	**66
80 under 100 percent	**	**	**	**	**	**	**	**	**	**
100 percent or more	3	3	56,700	72,480	334	334	468	468	896	—
With no foreign income taxes	**17	**20	**439,563	**1,154,728	**16,446	**16,446	**134	**134	**134	—
With foreign income taxes (-)	**	**	**	**	**	**	**	**	**	—
Foreign corporations with current earnings and profits deficit before taxes	78	101	356,818	613,166	-52,720	—	—	-2,930	2,805	—
Foreign corporations with no current earnings and profits (+) and (-) before taxes	23	25	12,516	11,122	—	—	—	-5	—	—
France (Including Andorra)										
All foreign corporations	814	1,651	25,390,429	47,018,919	2,531,162	2,885,643	1,008,759	1,002,298	607,177	489,848
Foreign corporations with current earnings and profits (+) before taxes:										
Total	547	985	21,079,302	40,882,799	2,885,643	2,885,643	1,008,759	1,008,759	597,192	489,848
With taxes (+) as a percent of current earnings and profits (+) before taxes:										
Total	467	807	19,403,529	37,611,723	2,778,746	2,778,746	1,011,755	1,011,755	592,139	486,651
Under 10 percent	46	55	2,657,210	5,855,541	343,621	343,621	4,340	4,340	36,007	26,429
10 under 20 percent	24	24	1,720,023	2,136,333	202,546	202,546	35,793	35,793	2,742	2,713
20 under 30 percent	53	62	2,869,880	10,168,638	352,580	352,580	97,791	97,791	55,320	49,530
30 under 40 percent	73	90	1,892,290	2,932,346	396,800	396,800	134,131	134,131	74,264	72,944
40 under 45 percent	51	55	3,990,465	3,767,734	506,749	506,749	212,555	212,555	174,112	153,077
45 under 50 percent	124	147	2,127,817	3,602,967	328,145	328,145	156,674	156,674	79,696	60,192
50 under 60 percent	186	242	2,478,077	4,742,185	445,197	445,197	236,428	236,428	115,532	83,747
60 under 80 percent	74	78	1,304,977	3,123,486	194,606	194,606	124,239	124,239	47,640	37,835
80 under 100 percent	24	25	108,158	232,135	5,024	5,024	4,449	4,449	1,569	183
100 percent or more	29	30	234,631	1,050,358	3,477	3,477	5,355	5,355	5,259	—
With no foreign income taxes	129	163	883,690	1,810,286	67,792	67,792	—	—	1,736	1,594
With foreign income taxes (-)	15	15	792,083	1,460,789	39,106	39,106	-2,996	-2,996	3,316	1,603
Foreign corporations with current earnings and profits deficit before taxes	348	476	4,273,839	6,101,066	-354,481	—	—	-6,463	9,985	—
Foreign corporations with no current earnings and profits (+) and (-) before taxes	131	189	37,289	35,054	—	—	—	2	—	—
Italy (Including San Marino)										
All foreign corporations	568	995	19,695,832	28,491,905	2,019,830	2,163,618	652,811	652,417	569,046	470,115
Foreign corporations with current earnings and profits (+) before taxes:										
Total	374	585	17,707,270	25,514,312	2,163,618	2,163,618	652,811	652,811	563,256	470,115
With taxes (+) as a percent of current earnings and profits (+) before taxes:										
Total	330	513	16,987,655	24,620,108	2,124,369	2,124,369	655,365	655,365	554,904	463,219
Under 10 percent	29	32	1,338,098	3,079,574	127,972	127,972	4,026	4,026	7,799	5,353
10 under 20 percent	32	44	2,869,071	6,651,820	395,652	395,652	71,121	71,121	63,335	62,000
20 under 30 percent	73	82	2,087,336	2,773,470	393,977	393,977	102,988	102,988	81,016	72,788
30 under 40 percent	131	152	7,772,381	7,474,733	829,610	829,610	301,899	301,899	306,037	259,922
40 under 45 percent	66	75	1,621,573	2,163,850	285,882	285,882	118,089	118,089	51,878	49,951
45 under 50 percent	38	41	411,221	871,702	39,830	39,830	18,820	18,820	3,988	3,257
50 under 60 percent	31	36	536,804	941,296	35,344	35,344	19,061	19,061	36,862	8,885
60 under 80 percent	17	17	111,007	229,382	9,408	9,408	6,081	6,081	2,432	856
80 under 100 percent	16	16	145,447	199,416	4,052	4,052	3,502	3,502	1,046	207
100 percent or more	19	19	94,717	234,864	2,641	2,641	9,777	9,777	511	—
With no foreign income taxes	58	63	412,419	457,291	24,058	24,058	—	—	6,815	6,815
With foreign income taxes (-)	9	9	307,197	436,913	15,191	15,191	-2,554	-2,554	1,538	82
Foreign corporations with current earnings and profits deficit before taxes	169	227	1,896,392	2,977,585	-143,787	—	—	-394	5,790	—
Foreign corporations with no current earnings and profits (+) and (-) before taxes	159	184	90,170	9	—	—	—	—	—	—

Footnotes at end of table.

## Controlled Foreign Corporations, 1980

Table 2.—Number of U.S. Corporation Returns and Number, Total Assets, Receipts, Earnings, Taxes, and Distributions of Controlled Foreign Corporations, by Selected Country of Incorporation and Taxes as a Percentage of Earnings and Profits of Controlled Foreign Corporation—Continued

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Selected country of incorporation and taxes (+) as a percent of current earnings and profits (+) before taxes	Number of U.S. corporation returns	Controlled Foreign Corporations								Distributions	
		Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign corporations with current earnings and profits (+) before taxes		Foreign income taxes (net)		Total	Out of current earnings and profits
						Current earnings and profits before taxes	Foreign income taxes (net)				
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)		
<b>Europe (continued)</b>											
<b>Netherlands</b>											
All foreign corporations	633	1,333	14,721,585	24,205,913	1,620,837	1,787,768	483,122	451,671	440,795	328,810	
Foreign corporations with current earnings and profits (+) before taxes:											
Total	453	778	11,263,577	19,932,849	1,787,768	1,787,768	483,122	483,122	422,973	324,866	
With taxes (+) as a percent of current earnings and profits (+) before taxes:											
Total	355	578	9,447,611	17,087,738	1,581,615	1,581,615	499,441	499,441	393,178	299,273	
Under 10 percent	46	59	1,843,712	1,978,937	332,167	332,167	11,999	11,999	30,737	29,695	
10 under 20 percent	22	25	721,498	865,010	84,690	84,690	11,982	11,982	9,863	7,863	
20 under 30 percent	42	45	1,567,225	4,953,888	264,491	264,491	66,732	66,732	40,821	39,319	
30 under 40 percent	68	76	1,179,396	1,851,682	154,624	154,624	52,473	52,473	19,630	12,279	
40 under 45 percent	76	95	1,322,239	2,109,215	296,503	296,503	125,762	125,762	108,151	93,521	
45 under 50 percent	103	132	1,483,046	2,353,688	326,477	326,477	155,630	155,630	144,984	103,238	
50 under 60 percent	50	53	542,081	1,317,675	83,502	83,502	45,606	45,606	9,819	7,324	
60 under 80 percent	40	43	608,674	1,372,289	33,430	33,430	22,572	22,572	21,330	5,933	
80 under 100 percent	18	19	51,545	48,477	2,262	2,262	2,017	2,017	439	102	
100 percent or more	30	31	128,196	136,877	3,529	3,529	4,668	4,668	7,402	—	
With no foreign income taxes	125	169	1,427,560	2,475,156	178,055	178,055	—	—	23,142	20,008	
With foreign income taxes (-)	29	32	388,406	369,955	28,098	28,098	-16,319	-16,319	6,653	5,585	
Foreign corporations with current earnings and profits deficit before taxes:	224	322	3,369,481	4,269,836	-166,931	—	—	-31,423	17,822	3,944	
Foreign corporations with no current earnings and profits (+) and (-) before taxes:	140	233	88,527	3,228	—	—	—	-28	—	—	
<b>Spain</b>											
All foreign corporations	307	513	7,064,117	9,238,146	304,529	581,104	122,151	123,158	165,924	135,397	
Foreign corporations with current earnings and profits (+) before taxes:											
Total	172	232	5,252,812	6,993,277	581,104	581,104	122,151	122,151	160,053	135,397	
With taxes (+) as a percent of current earnings and profits (+) before taxes:											
Total	135	175	4,819,035	6,269,399	559,373	559,373	122,425	122,425	152,673	130,264	
Under 10 percent	15	16	481,648	672,569	49,052	49,052	2,570	2,570	5,929	5,820	
10 under 20 percent	21	22	1,443,940	1,913,167	191,018	191,018	25,099	25,099	12,931	12,305	
20 under 30 percent	37	40	1,450,242	2,113,124	215,253	215,253	52,312	52,312	98,727	86,875	
30 under 40 percent	50	54	774,076	668,328	72,496	72,496	24,098	24,098	25,964	20,730	
40 under 45 percent	8	9	55,064	79,982	6,390	6,390	2,703	2,703	1,609	1,572	
45 under 50 percent	8	8	63,290	121,192	7,006	7,006	3,287	3,287	1,999	981	
50 under 60 percent	9	9	492,726	586,413	11,276	11,276	5,898	5,898	1,602	1,343	
60 under 80 percent	**7	**7	**35,316	**61,236	**5,179	**5,179	**4,176	**4,176	**3,299	**638	
80 under 100 percent	**	**	**	**	**	**	**	**	**	**	
100 percent or more	10	10	42,732	53,388	1,703	1,703	2,282	2,282	613	—	
With no foreign income taxes	48	53	353,590	553,372	20,550	20,550	—	—	5,878	5,133	
With foreign income taxes (-)	4	4	80,187	170,506	1,182	1,182	-275	-275	1,502	—	
Foreign corporations with current earnings and profits deficit before taxes:	149	196	1,807,069	2,244,558	-276,575	—	—	1,008	5,871	—	
Foreign corporations with no current earnings and profits (+) and (-) before taxes:	75	85	4,235	311	—	—	—	—	—	—	
<b>Sweden</b>											
All foreign corporations	272	481	3,964,935	6,628,259	329,215	397,499	121,689	114,609	83,156	67,252	
Foreign corporations with current earnings and profits (+) before taxes:											
Total	171	238	3,214,689	5,253,186	397,499	397,499	121,689	121,689	79,787	67,252	
With taxes (+) as a percent of current earnings and profits (+) before taxes:											
Total	143	186	2,441,409	4,058,057	368,741	368,741	122,097	122,097	78,072	66,183	
Under 10 percent	20	24	1,035,593	1,766,484	142,894	142,894	4,420	4,420	23,209	23,209	
10 under 20 percent	12	12	38,668	107,179	4,816	4,816	761	761	1,321	141	
20 under 30 percent	11	11	87,785	173,062	19,123	19,123	4,941	4,941	3,214	3,214	
30 under 40 percent	24	25	196,632	390,358	20,928	20,928	7,394	7,394	6,907	4,206	
40 under 45 percent	6	6	21,722	52,275	1,735	1,735	732	732	101	101	
45 under 50 percent	17	17	55,891	115,949	9,648	9,648	4,579	4,579	2,116	1,893	
50 under 60 percent	41	47	751,485	928,547	149,514	149,514	84,678	84,678	33,436	31,127	
60 under 80 percent	32	32	174,112	374,610	16,169	16,169	10,696	10,696	3,495	1,868	
80 under 100 percent	5	6	28,546	82,705	3,532	3,532	2,931	2,931	1,138	422	
100 percent or more	6	6	50,975	66,888	383	383	965	965	3,136	—	
With no foreign income taxes	41	47	657,244	1,039,690	27,352	27,352	—	—	1,643	997	
With foreign income taxes (-)	5	5	146,036	155,439	1,406	1,406	-407	-407	72	72	
Foreign corporations with current earnings and profits deficit before taxes:	98	118	746,843	1,375,073	-68,284	—	—	-7,080	3,093	—	
Foreign corporations with no current earnings and profits (+) and (-) before taxes:	63	125	3,404	—	—	—	—	—	276	—	

Footnotes at end of table.

**Table 2.—Number of U.S. Corporation Returns and Number, Total Assets, Receipts, Earnings, Taxes, and Distributions of Controlled Foreign Corporations, by Selected Country of Incorporation and Taxes as a Percentage of Earnings and Profits of Controlled Foreign Corporation—Continued**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Selected country of incorporation and taxes (+) as a percent of current earnings and profits (+) before taxes	Number of U.S. corporation returns	Controlled Foreign Corporations								
		Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign corporations with current earnings and profits (+) before taxes		Foreign income taxes (net)	Distributions	
						Current earnings and profits before taxes	Foreign income taxes (net)		Total	Out of current earnings and profits
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
<b>Europe (continued)</b>										
<b>Switzerland</b>										
All foreign corporations	605	1,122	17,175,638	29,704,272	2,030,810	2,186,519	390,631	391,094	637,569	411,972
Foreign corporations with current earnings and profits (+) before taxes:										
Total	430	708	14,240,659	27,834,215	2,186,519	2,186,519	390,631	390,631	622,712	411,972
With taxes (+) as a percent of current earnings and profits (+) before taxes:										
Total	346	547	13,470,717	26,604,488	2,130,998	2,130,998	392,830	392,830	608,071	409,612
Under 10 percent	95	105	3,027,854	3,833,928	494,211	494,211	38,343	38,343	185,583	116,979
10 under 20 percent	107	124	5,201,957	13,657,823	953,369	953,369	131,146	131,146	160,521	124,856
20 under 30 percent	109	127	2,392,269	3,576,427	357,719	357,719	88,179	88,179	105,797	86,116
30 under 40 percent	83	92	1,534,409	3,638,239	200,289	200,289	70,569	70,569	105,154	50,834
40 under 45 percent	17	18	174,489	258,645	35,217	35,217	14,976	14,976	16,106	8,775
45 under 50 percent	21	21	545,118	572,749	49,457	49,457	22,854	22,854	30,115	21,203
50 under 60 percent	18	18	53,298	75,873	8,200	8,200	4,451	4,451	3,241	834
60 under 80 percent	19	21	456,077	439,437	29,052	29,052	18,401	18,401	4	3
80 under 100 percent	9	9	23,938	29,340	1,120	1,120	990	990	1,522	12
100 percent or more	13	13	61,307	522,026	2,363	2,363	2,922	2,922	27	—
With no foreign income taxes	108	142	641,159	946,055	45,351	45,351	—	—	12,171	562
With foreign income taxes (-)	16	19	128,783	283,672	10,170	10,170	-2,199	-2,199	2,470	1,798
Foreign corporations with current earnings and profits deficit before taxes	238	310	2,917,459	1,866,095	-155,709	—	—	442	11,096	—
Foreign corporations with no current earnings and profits (+) and (-) before taxes	86	104	17,520	3,961	—	—	—	21	3,762	—
<b>United Kingdom</b>										
All foreign corporations	1,557	5,031	75,916,888	99,112,663	8,033,716	9,540,775	2,658,360	2,528,236	2,121,430	1,669,179
Foreign corporations with current earnings and profits (+) before taxes:										
Total	1,045	2,281	61,651,056	82,855,354	9,540,775	9,540,775	2,658,360	2,658,360	2,078,048	1,668,598
With taxes (+) as a percent of current earnings and profits (+) before taxes:										
Total	741	1,504	50,064,159	66,310,088	8,587,239	8,587,239	2,721,600	2,721,600	1,936,214	1,562,907
Under 10 percent	121	146	12,742,434	17,331,149	2,180,233	2,180,233	96,870	96,870	998,703	872,514
10 under 20 percent	106	118	2,129,496	2,962,550	246,398	246,398	38,572	38,572	33,006	30,356
20 under 30 percent	151	170	6,846,527	8,094,460	1,016,762	1,016,762	266,465	266,465	173,214	145,107
30 under 40 percent	181	223	10,297,491	12,533,778	1,284,525	1,284,525	447,261	447,261	140,293	115,811
40 under 45 percent	125	142	2,579,262	3,261,074	1,603,130	1,603,130	662,027	662,027	73,555	62,903
45 under 50 percent	150	180	4,165,302	6,937,869	743,788	743,788	349,851	349,851	105,139	74,310
50 under 60 percent	195	330	8,919,817	10,875,185	1,199,618	1,199,618	629,184	629,184	382,467	251,301
60 under 80 percent	90	113	1,821,537	3,687,734	267,945	267,945	183,960	183,960	22,256	10,443
80 under 100 percent	39	43	331,262	414,636	37,449	37,449	33,181	33,181	1,616	161
100 percent or more	34	40	231,031	211,652	7,391	7,391	14,231	14,231	5,966	—
With no foreign income taxes	409	617	7,989,091	10,685,651	730,664	730,664	—	—	106,075	73,030
With foreign income taxes (-)	134	160	3,597,806	5,859,615	222,872	222,872	-63,240	-63,240	35,759	32,661
Foreign corporations with current earnings and profits deficit before taxes	611	977	13,657,087	16,184,238	-1,507,058	—	—	-130,185	40,150	581
Foreign corporations with no current earnings and profits (+) and (-) before taxes	532	1,773	608,745	73,072	—	—	—	61	3,231	—
<b>West Germany</b>										
All foreign corporations	987	2,049	46,131,107	72,487,510	4,890,880	5,749,509	2,300,671	2,279,488	1,669,557	887,058
Foreign corporations with current earnings and profits (+) before taxes:										
Total	688	1,254	36,560,097	61,118,296	5,749,509	5,749,509	2,300,671	2,300,671	1,545,226	887,048
With taxes (+) as a percent of current earnings and profits (+) before taxes:										
Total	539	889	32,241,026	56,844,164	5,555,840	5,555,840	2,302,399	2,302,399	1,506,633	856,136
Under 10 percent	52	66	1,755,477	2,165,680	211,864	211,864	9,375	9,375	49,448	34,877
10 under 20 percent	45	54	1,189,153	1,633,000	130,075	130,075	21,263	21,263	64,703	50,037
20 under 30 percent	58	66	6,812,911	12,094,520	1,219,163	1,219,163	322,702	322,702	104,883	66,721
30 under 40 percent	94	123	7,996,077	14,855,767	1,722,755	1,722,755	601,944	601,944	736,116	311,367
40 under 45 percent	77	90	2,346,589	4,752,359	491,689	491,689	211,926	211,926	115,714	72,573
45 under 50 percent	143	159	5,529,868	4,168,726	562,553	562,553	262,850	262,850	203,448	163,003
50 under 60 percent	119	138	2,196,385	5,467,470	424,122	424,122	230,804	230,804	98,067	58,357
60 under 80 percent	122	129	2,270,583	4,558,842	206,927	206,927	133,260	133,260	33,153	18,792
80 under 100 percent	29	29	1,882,575	4,426,868	566,951	566,951	484,641	484,641	98,044	80,409
100 percent or more	33	36	261,389	2,720,932	19,742	19,742	23,636	23,636	3,057	—
With no foreign income taxes	219	339	3,918,612	3,789,882	166,586	166,586	—	—	36,426	29,829
With foreign income taxes (-)	20	25	400,459	484,250	27,083	27,083	-1,729	-1,729	2,166	1,084
Foreign corporations with current earnings and profits deficit before taxes	397	537	9,520,967	11,330,903	-858,630	—	—	-21,183	124,300	9
Foreign corporations with no current earnings and profits (+) and (-) before taxes	171	259	50,043	38,311	—	—	—	—	31	—

Footnotes at end of table.

## Controlled Foreign Corporations, 1980

Table 2.—Number of U.S. Corporation Returns and Number, Total Assets, Receipts, Earnings, Taxes, and Distributions of Controlled Foreign Corporations, by Selected Country of Incorporation and Taxes as a Percentage of Earnings and Profits of Controlled Foreign Corporation—Continued

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Selected country of incorporation and taxes (+) as a percent of current earnings and profits (+) before taxes	Number of U.S. corporation returns	Controlled Foreign Corporations							Distributions	
		Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign corporations with current earnings and profits (+) before taxes		Foreign income taxes (net)		
						Current earnings and profits before taxes	Foreign income taxes (net)		Total	Out of current earnings and profits
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Africa, total										
All foreign corporations	521	1,668	17,194,842	22,669,414	1,704,355	2,091,626	547,960	548,240	732,986	340,029
Foreign corporations with current earnings and profits (+) before taxes:										
Total	373	967	13,276,344	19,892,760	2,091,626	2,091,626	547,960	547,960	723,261	340,029
With taxes (+) as a percent of current earnings and profits (+) before taxes:										
Total	275	628	7,877,224	13,102,744	1,672,800	1,672,800	552,933	552,933	338,435	263,084
Under 10 percent	33	39	802,149	801,636	165,989	165,989	5,914	5,914	10,778	9,972
10 under 20 percent	24	30	711,365	1,161,416	182,778	182,778	24,171	24,171	13,092	6,096
20 under 30 percent	64	81	1,081,865	2,857,175	258,017	258,017	62,802	62,802	55,181	50,977
30 under 40 percent	109	168	2,675,426	4,175,367	495,014	495,014	172,345	172,345	146,272	104,807
40 under 45 percent	100	138	1,153,528	2,065,829	312,217	312,217	131,353	131,353	76,596	68,314
45 under 50 percent	50	67	555,863	823,269	99,239	99,239	46,388	46,388	17,059	12,020
50 under 60 percent	40	52	584,690	658,985	103,834	103,834	54,956	54,956	12,892	6,794
60 under 80 percent	25	29	152,634	238,475	20,974	20,974	14,280	14,280	4,276	4,083
80 under 100 percent	9	9	31,917	54,496	2,406	2,406	2,131	2,131	58	21
100 percent or more	14	15	127,785	266,096	32,332	32,332	38,593	38,593	2,230	—
With no foreign income taxes	159	329	5,182,614	6,415,861	393,761	393,761	—	—	371,936	72,765
With foreign income taxes (-)	10	10	216,506	374,155	25,065	25,065	-4,974	-4,974	12,890	4,179
Foreign corporations with current earnings and profits deficit before taxes	139	275	3,633,453	2,762,776	-387,271	—	—	281	8,547	—
Foreign corporations with no current earnings and profits (+) and (-) before taxes	224	426	285,045	13,878	—	—	—	(1)	1,178	—
Liberia										
All foreign corporations	158	509	8,855,733	8,517,246	156,069	498,350	16,908	17,353	343,407	45,119
Foreign corporations with current earnings and profits (+) before taxes:										
Total	98	253	5,490,727	6,005,639	498,350	498,350	16,908	16,908	339,916	45,119
With taxes (+) as a percent of current earnings and profits (+) before taxes:										
Total	20	28	985,032	913,575	193,593	193,593	20,807	20,807	6,114	5,087
Under 10 percent	9	9	722,920	725,641	151,614	151,614	5,414	5,414	2,300	2,300
10 under 20 percent	—	—	—	—	—	—	—	—	—	—
20 under 30 percent	5	5	70,109	61,767	23,585	23,585	6,153	6,153	121	91
30 under 40 percent	**5	**5	**19,070	**4,059	**1,845	**1,845	**736	**736	**1,065	**1,033
40 under 45 percent	**	**	—	—	—	—	—	—	—	—
45 under 50 percent	**8	**9	**172,933	**122,108	**16,549	**16,549	**8,504	**8,504	**2,628	**1,663
50 under 60 percent	**	**	—	—	—	—	—	—	—	—
60 under 80 percent	**	**	—	—	—	—	—	—	—	—
80 under 100 percent	**	**	—	—	—	—	—	—	—	—
100 percent or more	—	—	—	—	—	—	—	—	—	—
With no foreign income taxes	86	222	4,489,098	5,092,064	303,034	303,034	—	—	321,149	36,089
With foreign income taxes (-)	3	3	16,597	—	1,722	1,722	-3,899	-3,899	12,653	3,943
Foreign corporations with current earnings and profits deficit before taxes	47	134	3,165,047	2,498,932	-342,281	—	—	445	3,491	—
Foreign corporations with no current earnings and profits (+) and (-) before taxes	74	123	199,959	12,675	—	—	—	—	—	—

Footnotes at end of table.

**Table 2.—Number of U.S. Corporation Returns and Number, Total Assets, Receipts, Earnings, Taxes, and Distributions of Controlled Foreign Corporations, by Selected Country of Incorporation and Taxes as a Percentage of Earnings and Profits of Controlled Foreign Corporation—Continued**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Selected country of incorporation and taxes (+) as a percent of current earnings and profits (+) before taxes	Number of U.S. corporation returns	Controlled Foreign Corporations								
		Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign corporations with current earnings and profits (+) before taxes		Foreign income taxes (net)	Distributions	
						Current earnings and profits before taxes	Foreign income taxes (net)		Total	Out of current earnings and profits
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Africa (continued)										
South Africa (Including S.W. Africa)										
All foreign corporations	324	674	5,141,003	8,947,163	969,082	975,722	272,077	272,607	238,271	179,653
Foreign corporations with current earnings and profits (+) before taxes:										
Total	264	462	4,969,212	8,835,583	975,722	975,722	272,077	272,077	236,758	179,653
With taxes (+) as a percent of current earnings and profits (+) before taxes:										
Total	229	377	4,316,406	7,689,396	894,758	894,758	272,545	272,545	224,855	170,000
Under 10 percent	19	20	56,782	53,615	11,275	11,275	299	299	6,493	6,121
10 under 20 percent	17	19	588,363	913,960	168,524	168,524	21,773	21,773	7,747	750
20 under 30 percent	50	57	826,702	2,428,177	170,445	170,445	40,492	40,492	46,970	43,794
30 under 40 percent	93	118	1,843,792	2,557,733	301,139	301,139	106,933	106,933	99,934	64,787
40 under 45 percent	86	113	837,082	1,551,775	230,491	230,491	96,200	96,200	61,039	53,964
45 under 50 percent	12	13	60,746	81,395	7,436	7,436	3,512	3,512	220	220
50 under 60 percent	12	15	35,241	24,727	3,247	3,247	1,743	1,743	2,014	169
60 under 80 percent	**16	**17	**59,310	**71,032	**2,163	**2,163	**1,509	**1,509	**386	**195
80 under 100 percent	**	**	**	**	**	**	**	**	**	**
100 percent or more	5	5	8,388	6,982	38	38	84	84	52	—
With no foreign income taxes	58	79	469,403	780,574	59,981	59,981	—	—	11,666	9,416
With foreign income taxes (-)	6	6	183,404	365,613	20,983	20,983	-468	-468	237	237
Foreign corporations with current earnings and profits deficit before taxes	43	55	135,558	110,377	-6,640	—	—	531	335	—
Foreign corporations with no current earnings and profits (+) and (-) before taxes	91	158	36,233	1,203	—	—	—	( <sup>1</sup> )	1,178	—
Asia, total										
All foreign corporations	946	2,769	31,485,764	41,008,878	4,017,655	4,318,504	1,356,698	1,332,532	963,064	786,618
Foreign corporations with current earnings and profits (+) before taxes:										
Total	697	1,693	28,164,166	37,602,316	4,318,504	4,318,504	1,356,698	1,356,698	943,971	786,393
With taxes (+) as a percent of current earnings and profits (+) before taxes:										
Total	565	1,286	24,794,149	33,959,418	3,866,461	3,866,461	1,361,345	1,361,345	888,118	737,871
Under 10 percent	126	150	2,896,742	2,632,445	464,942	464,942	16,651	16,651	103,964	62,283
10 under 20 percent	178	234	4,815,867	4,180,965	562,531	562,531	82,635	82,635	119,614	85,074
20 under 30 percent	126	162	2,546,912	2,507,282	348,244	348,244	89,947	89,947	62,235	57,118
30 under 40 percent	154	216	3,142,409	8,580,036	857,529	857,529	284,386	284,386	144,581	139,683
40 under 45 percent	107	137	2,240,979	2,553,123	293,539	293,539	122,053	122,053	69,072	54,269
45 under 50 percent	102	126	2,502,956	3,151,485	527,959	527,959	251,450	251,450	202,251	195,082
50 under 60 percent	100	120	3,393,833	7,213,823	524,858	524,858	298,727	298,727	115,713	100,556
60 under 80 percent	78	89	919,568	1,137,257	225,691	225,691	151,274	151,274	46,206	42,685
80 under 100 percent	18	19	879,412	1,386,588	43,946	43,946	40,581	40,581	23,264	1,141
100 percent or more	28	31	1,455,470	616,413	17,222	17,222	23,640	23,640	1,217	—
With no foreign income taxes	279	371	2,670,388	2,797,817	370,556	370,556	—	—	49,483	46,564
With foreign income taxes (-)	32	36	699,629	845,081	81,487	81,487	-4,647	-4,647	6,370	1,958
Foreign corporations with current earnings and profits deficit before taxes	396	615	3,194,739	3,393,066	-300,850	—	—	-24,166	13,110	225
Foreign corporations with no current earnings and profits (+) and (-) before taxes	276	461	126,859	13,495	—	—	—	—	5,983	—
Hong Kong										
All foreign corporations	415	665	8,275,576	5,821,380	729,868	756,757	159,581	158,947	242,072	192,170
Foreign corporations with current earnings and profits (+) before taxes:										
Total	291	398	7,924,820	5,590,562	756,757	756,757	159,581	159,581	239,938	192,170
With taxes (+) as a percent of current earnings and profits (+) before taxes:										
Total	229	286	6,547,990	5,009,349	657,831	657,831	159,621	159,621	207,006	161,619
Under 10 percent	62	65	1,178,615	765,651	146,334	146,334	6,737	6,737	50,521	40,069
10 under 20 percent	138	165	3,597,853	2,563,940	316,893	316,893	47,340	47,340	112,850	79,795
20 under 30 percent	23	23	990,070	471,097	25,529	25,529	6,038	6,038	1,749	1,163
30 under 40 percent	14	14	366,279	944,883	42,813	42,813	13,672	13,672	7,674	7,098
40 under 45 percent	4	4	90,635	28,023	1,870	1,870	818	818	—	—
45 under 50 percent	3	3	38,484	28,883	537	537	250	250	—	—
50 under 60 percent	3	3	122,893	11,997	1,442	1,442	815	815	81	81
60 under 80 percent	**9	**9	**163,161	**194,875	**122,413	**122,413	**83,951	**83,951	**34,131	**33,413
80 under 100 percent	**	**	**	**	**	**	**	**	**	**
100 percent or more	**	**	**	**	**	**	**	**	**	**
With no foreign income taxes	96	107	1,332,211	482,480	96,424	96,424	—	—	32,932	30,551
With foreign income taxes (-)	4	4	44,618	98,734	2,502	2,502	-41	-41	—	—
Foreign corporations with current earnings and profits deficit before taxes	110	130	334,640	229,727	-26,889	—	—	-634	2,135	—
Foreign corporations with no current earnings and profits (+) and (-) before taxes	109	138	16,117	1,090	—	—	—	—	—	—

Footnotes at end of table.

## Controlled Foreign Corporations, 1980

Table 2.—Number of U.S. Corporation Returns and Number, Total Assets, Receipts, Earnings, Taxes, and Distributions of Controlled Foreign Corporations, by Selected Country of Incorporation and Taxes as a Percentage of Earnings and Profits of Controlled Foreign Corporation—Continued

[All figures are estimates based on samples—money amounts are in thousands of dollars]

All figures are estimates based on samples—money amounts are in thousands of dollars										
Selected country of incorporation and taxes (+) as a percent of current earnings and profits (+) before taxes	Number of U.S. corporation returns	Controlled Foreign Corporations							Distributions	
		Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign corporations with current earnings and profits (+) before taxes		Foreign income taxes (net)		
						Current earnings and profits before taxes	Foreign income taxes (net)		Total	Out of current earnings and profits
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
<b>Asia (continued)</b>										
<b>Japan</b>										
All foreign corporations	423	595	10,214,965	16,175,231	1,497,131	1,617,141	709,933	693,713	378,418	334,758
Foreign corporations with current earnings and profits (+) before taxes:										
Total	306	402	9,253,143	15,278,992	1,617,141	1,617,141	709,933	709,933	374,803	334,533
With taxes (+) as a percent of current earnings and profits (+) before taxes:										
Total	255	326	8,925,724	14,869,606	1,598,531	1,598,531	711,202	711,202	373,402	333,660
Under 10 percent	18	19	106,955	69,026	15,396	15,396	615	615	516	490
10 under 20 percent	14	14	41,655	92,273	5,575	5,575	809	809	232	195
20 under 30 percent	28	29	519,398	556,577	122,175	122,175	34,642	34,642	12,954	12,954
30 under 40 percent	48	52	1,482,629	4,272,846	497,378	497,378	155,788	155,788	61,700	61,347
40 under 45 percent	25	26	226,612	412,445	30,834	30,834	13,079	13,079	9,862	3,592
45 under 50 percent	50	54	1,838,911	2,038,291	442,672	442,672	211,115	211,115	178,186	174,316
50 under 60 percent	65	69	2,708,660	6,095,849	412,911	412,911	236,233	236,233	90,084	78,015
60 under 80 percent	37	37	376,988	508,099	46,705	46,705	30,669	30,669	3,054	2,620
80 under 100 percent	9	9	285,824	348,618	12,707	12,707	10,983	10,983	16,728	131
100 percent or more	15	16	1,338,092	475,583	12,177	12,177	17,270	17,270	85	—
With no foreign income taxes	64	69	230,000	258,250	18,086	18,086	—	—	308	308
With foreign income taxes (-)	*8	*8	*97,419	*151,135	*524	*524	*-1,268	*-1,268	*1,093	*565
Foreign corporations with current earnings and profits deficit before taxes	132	153	936,200	889,146	-120,010	—	—	-16,221	3,207	225
Foreign corporations with no current earnings and profits (+) and (-) before taxes	38	41	25,622	7,094	—	—	—	—	408	—
<b>Oceania, total</b>										
All foreign corporations	681	1,976	21,874,465	23,104,538	1,737,143	1,997,387	706,528	726,449	414,652	353,892
Foreign corporations with current earnings and profits (+) before taxes:										
Total	481	1,102	18,463,762	19,365,988	1,997,387	1,997,387	706,528	706,528	407,866	353,637
With taxes (+) as a percent of current earnings and profits (+) before taxes:										
Total	390	835	16,287,004	17,848,459	1,897,444	1,897,444	708,283	708,283	391,421	339,355
Under 10 percent	47	58	2,048,185	669,467	115,368	115,368	3,248	3,248	31,520	27,781
10 under 20 percent	34	37	660,236	321,870	78,057	78,057	11,295	11,295	6,861	1,277
20 under 30 percent	59	68	530,763	615,795	65,961	65,961	18,043	18,043	9,145	6,093
30 under 40 percent	121	157	5,514,494	6,469,904	746,945	746,945	256,752	256,752	142,530	125,137
40 under 45 percent	132	175	3,150,330	3,135,845	348,317	348,317	149,374	149,374	70,636	66,761
45 under 50 percent	166	239	2,965,753	4,416,342	426,636	426,636	199,334	199,334	104,974	97,516
50 under 60 percent	50	60	994,247	1,752,401	87,879	87,879	47,354	47,354	20,176	11,871
60 under 80 percent	18	20	255,762	252,270	21,459	21,459	14,374	14,374	4,758	2,910
80 under 100 percent	8	9	33,565	37,585	3,855	3,855	3,376	3,376	239	10
100 percent or more	12	13	133,669	176,980	2,967	2,967	5,135	5,135	581	—
With no foreign income taxes	166	239	1,641,742	1,340,178	82,095	82,095	—	—	16,070	13,917
With foreign income taxes (-)	24	28	535,016	177,352	17,848	17,848	-1,756	-1,756	375	365
Foreign corporations with current earnings and profits deficit before taxes	241	362	3,325,734	3,722,710	-260,244	—	—	19,909	6,444	255
Foreign corporations with no current earnings and profits (+) and (-) before taxes	231	512	84,969	15,839	—	—	—	12	342	—

Footnotes at end of table.



**Table 2.—Number of U.S. Corporation Returns and Number, Total Assets, Receipts, Earnings, Taxes, and Distributions of Controlled Foreign Corporations, by Selected Country of Incorporation and Taxes as a Percentage of Earnings and Profits of Controlled Foreign Corporation—Continued**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Selected country of incorporation and taxes (+) as a percent of current earnings and profits (+) before taxes	Number of U.S. corporation returns	Controlled Foreign Corporations								Distributions	
		Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign corporations with current earnings and profits (+) before taxes		Foreign income taxes (net)			
						Current earnings and profits before taxes	Foreign income taxes (net)		Total	Out of current earnings and profits	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	
<b>Oceania (continued)</b>											
<b>Australia</b>											
All foreign corporations .....	647	1,602	20,418,036	20,639,051	1,555,874	1,803,113	642,907	662,657	368,286	312,262	
Foreign corporations with current earnings and profits (+) before taxes:											
Total .....	454	918	17,293,587	17,209,693	1,803,113	1,803,113	642,907	642,907	361,586	312,008	
With taxes (+) as a percent of current earnings and profits (+) before taxes:											
Total .....	375	700	15,340,877	15,979,465	1,727,083	1,727,083	644,512	644,512	348,124	299,930	
Under 10 percent .....	43	53	2,017,453	628,233	110,718	110,718	3,163	3,163	31,243	27,503	
10 under 20 percent .....	31	33	649,206	308,461	76,663	76,663	11,021	11,021	6,385	801	
20 under 30 percent .....	53	59	473,790	520,548	58,992	58,992	16,121	16,121	8,852	5,800	
30 under 40 percent .....	110	130	5,222,024	5,827,334	665,335	665,335	230,508	230,508	115,767	99,181	
40 under 45 percent .....	117	144	2,889,314	2,558,979	301,791	301,791	129,363	129,363	63,133	59,577	
45 under 50 percent .....	144	201	2,839,210	4,222,370	407,359	407,359	190,279	190,279	101,268	93,845	
50 under 60 percent .....	41	49	905,111	1,543,319	83,653	83,653	45,055	45,055	16,136	10,516	
60 under 80 percent .....	12	14	185,628	169,256	15,961	15,961	10,712	10,712	4,556	2,708	
80 under 100 percent .....	7	7	29,219	31,136	3,731	3,731	3,262	3,262	229	—	
100 percent or more .....	10	11	129,921	169,829	2,881	2,881	5,027	5,027	555	—	
With no foreign income taxes .....	141	197	1,465,405	1,064,731	59,406	59,406	—	—	13,462	12,078	
With foreign income taxes (—) .....	19	22	487,305	165,497	16,624	16,624	-1,604	-1,604	—	—	
Foreign corporations with current earnings and profits deficit before taxes .....	207	291	3,044,195	3,422,108	-247,239	—	—	19,737	6,359	255	
Foreign corporations with no current earnings and profits (+) and (—) before taxes .....	209	393	80,254	7,250	—	—	—	12	342	—	
<b>Puerto Rico and U.S. Possessions, total</b>											
All foreign corporations .....	246	488	3,753,865	6,772,365	228,834	248,150	57,449	56,944	19,708	13,245	
Foreign corporations with current earnings and profits (+) before taxes:											
Total .....	159	285	3,353,704	6,610,362	248,150	248,150	57,449	57,449	19,614	13,245	
With taxes (+) as a percent of current earnings and profits (+) before taxes:											
Total .....	123	228	3,213,433	6,440,564	237,045	237,045	57,523	57,523	19,606	13,238	
Under 10 percent .....	10	11	74,497	35,293	8,881	8,881	500	500	—	—	
10 under 20 percent .....	20	20	1,887,151	5,128,774	119,265	119,265	17,494	17,494	949	949	
20 under 30 percent .....	47	75	500,137	591,709	37,871	37,871	10,029	10,029	5,664	1,572	
30 under 40 percent .....	36	72	254,006	240,577	22,198	22,198	7,746	7,746	8,464	6,686	
40 under 45 percent .....	29	35	419,512	395,383	41,187	41,187	17,860	17,860	4,030	4,031	
45 under 50 percent .....	4	6	16,166	19,072	3,230	3,230	1,481	1,481	499	—	
50 under 60 percent .....	**6	**5	**45,863	**8,527	**4,253	**4,253	**2,179	**2,179	—	—	
60 under 80 percent .....	—	—	—	—	—	—	—	—	—	—	
80 under 100 percent .....	**	**	—	—	—	—	—	—	—	—	
100 percent or more .....	3	4	16,101	21,229	160	160	234	234	—	—	
With no foreign income taxes .....	45	51	130,800	161,467	11,017	11,017	—	—	8	8	
With foreign income taxes (—) .....	3	6	9,471	8,332	88	88	-74	-74	—	—	
Foreign corporations with current earnings and profits deficit before taxes .....	78	104	367,117	160,529	-19,316	—	—	-505	94	—	
Foreign corporations with no current earnings and profits (+) and (—) before taxes .....	64	99	33,045	1,474	—	—	—	—	—	—	
<b>OPEC Countries, total (included above)</b>											
All foreign corporations .....	339	859	7,131,635	9,018,260	880,128	1,048,218	301,365	296,734	276,964	227,209	
Foreign corporations with current earnings and profits (+) before taxes:											
Total .....	218	467	5,844,383	7,581,361	1,048,218	1,048,218	301,365	301,365	271,252	227,209	
With taxes (+) as a percent of current earnings and profits (+) before taxes:											
Total .....	172	350	4,644,929	6,014,021	866,309	866,309	302,553	302,553	223,613	192,960	
Under 10 percent .....	31	35	819,431	775,616	93,881	93,881	3,113	3,113	28,980	26,997	
10 under 20 percent .....	36	55	391,669	435,845	62,448	62,448	8,928	8,928	10,851	10,053	
20 under 30 percent .....	65	95	678,260	900,352	101,481	101,481	25,726	25,726	24,278	18,845	
30 under 40 percent .....	63	86	1,115,550	1,652,387	271,195	271,195	94,461	94,461	74,709	63,929	
40 under 45 percent .....	29	34	1,015,008	1,576,591	197,607	197,607	83,511	83,511	50,525	40,404	
45 under 50 percent .....	19	22	202,426	206,287	55,512	55,512	25,776	25,776	18,403	18,004	
50 under 60 percent .....	8	8	307,765	355,319	54,428	54,428	27,680	27,680	15,750	14,611	
60 under 80 percent .....	6	6	38,159	23,523	1,283	1,283	893	893	118	118	
80 under 100 percent .....	3	3	4,978	8,962	569	569	506	506	—	—	
100 percent or more .....	6	6	71,684	79,140	27,906	27,906	31,958	31,958	—	—	
With no foreign income taxes .....	84	106	1,080,222	1,465,694	172,335	172,335	—	—	47,241	33,851	
With foreign income taxes (—) .....	9	11	119,232	101,646	9,574	9,574	-1,188	-1,188	397	397	
Foreign corporations with current earnings and profits deficit before taxes .....	126	168	1,173,238	1,436,900	-168,090	—	—	-4,630	5,712	—	
Foreign corporations with no current earnings and profits (+) and (—) before taxes .....	148	224	114,013	—	—	—	—	—	—	—	

\*Estimate should be used with caution because of small number of sample returns on which it was based.

\*\*Data deleted to avoid disclosure of information to specific corporations.

(\*) Less than \$500.

Note: Detail may not add to total because of rounding.